Contents

1. Respondent 15601057 1
2. Respondent 15610465 500
3. Respondent 15641281 1000
4. Respondent 15699201 1500
5. Respondent 17205665 2000
6. Respondent 17328801 2500
Proposed Submission Local Plan Regulation 19 representations (2016 and 2017)

Comment ID: PSLPA16/3434  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

Comment ID: PSLPA16/3433  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

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

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

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

Attached documents:

Comment ID: PSLPA16/3435  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

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

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

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

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

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

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

Note the following accident data:

2010 –2014 from Crashmap data

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

2015

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

2016

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

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

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

Attached documents:

Comment ID: PSLPS16/6693  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14059  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14066  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

I OBJECT to Policy D3 - Historic environment

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

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

Attached documents:

Comment ID: PSLPP16/14067  Respondent: 15601057 / Chris Vinall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14056  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

I OBJECT to the sustainable employment policy (Policy E1)

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14057  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14058  Respondent: 15601057 / Chris Vinall  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

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

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

Attached documents:

Comment ID: PSLPP16/14069  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14065  Respondent: 15601057 / Chris Vinall  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7  

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

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

I OBJECT to Policy E7 Guildford Town Centre

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14063  Respondent: 15601057 / Chris Vinall  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14064  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

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

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

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

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

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

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

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

**Attached documents:**

---

**Comment ID:** PSLPP16/14068  **Respondent:** 15601057 / Chris Vinall  **Agent:**

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14060</th>
<th>Respondent: 15601057 / Chris Vinall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14061</th>
<th>Respondent: 15601057 / Chris Vinall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

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

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

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

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14062</th>
<th>Respondent: 15601057 / Chris Vinall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

I OBJECT to poor air quality concerns (Policy I3)

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to not protecting the Green Belt (Policy P2)

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

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

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

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

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

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

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

---

**Comment ID:** PSLPP16/14052  **Respondent:** 15601057 / Chris Vinall  **Agent:**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

**Comment ID:** PSLPP16/14050  **Respondent:** 15601057 / Chris Vinall  **Agent:**  

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

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

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

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

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

In particular, I am greatly dismayed by the extent to which this version of the Local Plan is the same or worse than the version on which the previous consultation exercise was conducted. This rather makes a mockery of the use of the word ‘consultation’, making it seem merely a legal box-ticking exercise. I remember the arguments in favour of the previous plan being adopted were mainly that it was preferable to set our own plan than have one imposed on us by central
government. I note that this argument is not being used this time, presumably because it is no longer valid, the government and the economic situation in which it operates have changed enormously. Yet no alternative compelling argument has been advanced in favour of a vast increase in development of the area.

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

Attached documents:

---

Comment ID: SQLP16/1635  Respondent: 15601057 / Chris Vinall  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): (No)

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

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

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

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

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

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

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

Attached documents:

---

Comment ID: SQLP16/1636  Respondent: 15601057 / Chris Vinall  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): (No)

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

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

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

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

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

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

Attached documents:

Comment ID: SQLP16/1637  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

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

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

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.
The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

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

Attached documents:

Comment ID: SQLP16/1638  Respondent: 15601057 / Chris Vinall  Agent:

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

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

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

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

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

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

This is not cooperation by any definition.

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

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

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

Attached documents:

Comment ID: PSLPA16/3436  Respondent: 15601121 / Elspeth Anderson  Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3437</th>
<th>Respondent:</th>
<th>15601121 / Elspeth Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6694</th>
<th>Respondent:</th>
<th>15601121 / Elspeth Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43).

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPS16/6695  Respondent: 15601121 / Elspeth Anderson  Agent:

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

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

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

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

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of „through“ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14093</th>
<th>Respondent: 15601121 / Elspeth Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14086</th>
<th>Respondent: 15601121 / Elspeth Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

I object to the sustainable employment policy (Policy E1). If developed, the new employment site at Garlick’s Arch, would be treated as a Strategic Employment Site.

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

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

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14088</th>
<th>Respondent: 15601121 / Elspeth Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites. There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14090</th>
<th>Respondent: 15601121 / Elspeth Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14095</th>
<th>Respondent: 15601121 / Elspeth Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

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

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

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

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

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

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

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

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

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

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

Funding for police services is constantly being reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

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

Attached documents:

Comment ID: PSLPP16/14097  Respondent: 15601121 / Elspeth Anderson  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situation worse.

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

Attached documents:

---

Comment ID: PSLPP16/14099  Respondent: 15601121 / Elspeth Anderson  Agent:

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

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

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

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

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

Attached documents:

---

Comment ID: PSLPP16/14079  Respondent: 15601121 / Elspeth Anderson  Agent:

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

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

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

I object to not protecting the Green Belt (Policy P2)
I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

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

Attached documents:

Comment ID: PSLPP16/14085  Respondent: 15601121 / Elspeth Anderson  Agent:

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

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

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

I object to development in areas which are at risk of flooding (Policy P4)
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.
The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. As this site often floods during the winter months and the flooding is made worse by the soil being heavy clay, the SFRA is clearly not fit for purpose and needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

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

Attached documents:

Comment ID: PSLPP16/14081  Respondent: 15601121 / Elspeth Anderson  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Local Plan as the development proposed will not be sustainable (Policy S1)
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact upon existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities. The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are already few and far between so residents will have to be using their cars. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion, particularly Ripley High Street which already suffers mile long tailbacks at peak times. More cars of the road will mean even worse acute congestion and greater pollution. Residents and the environment will suffer as a result.

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

Attached documents:

Comment ID: PSLPP16/14083  Respondent: 15601121 / Elspeth Anderson  Agent:

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

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

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

I object to the Borough Wide Strategy (Policy S2)
The borough wide strategy is not well thought through. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages.

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

Attached documents:

Comment ID: PSLPA16/3442  Respondent: 15601185 / Jane Young  Agent:
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

Comment ID: PSLPA16/3439  Respondent: 15601185 / Jane Young  Agent:

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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

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

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6703</th>
<th>Respondent:</th>
<th>15601185 / Jane Young</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

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

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

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

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

Note the following accident data:

2010 – 2014 from Crashmap data

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

2015

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

2016

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

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

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

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

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

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

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

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

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

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

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

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

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

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

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

Attached documents:

Comment ID: PSLPP16/14144  Respondent: 15601185 / Jane Young  Agent:

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

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

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

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

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

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

Attached documents:

---

Comment ID: PSLPP16/14173  Respondent: 15601185 / Jane Young  Agent:

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

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

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

- I OBJECT to Policy D3 - Historic environment

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

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

- Attached documents:

---

Comment ID: PSLPP16/14176  Respondent: 15601185 / Jane Young  Agent:

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

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

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

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

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

- The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14129  Respondent: 15601185 / Jane Young  Agent:

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

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

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

I OBJECT to the sustainable employment policy (Policy E1)

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14135  Respondent: 15601185 / Jane Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
<table>
<thead>
<tr>
<th><strong>Comment ID:</strong> PSLPP16/14139  <strong>Respondent:</strong> 15601185 / Jane Young  <strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
</tr>
</tbody>
</table>

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

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

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

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

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

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

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

Attended documents:

<table>
<thead>
<tr>
<th><strong>Comment ID:</strong> PSLPP16/14182  <strong>Respondent:</strong> 15601185 / Jane Young  <strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
</tr>
</tbody>
</table>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14170   Respondent: 15601185 / Jane Young   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E7 Guildford Town Centre

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14164  Respondent: 15601185 / Jane Young  Agent:

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

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

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

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

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

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

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

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

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

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

Attached documents:

---

**Comment ID:** PSLPP16/14167  **Respondent:** 15601185 / Jane Young  **Agent:**

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

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

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

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

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

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

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

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

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

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

**Attached documents:**

---

**Comment ID:** PSLPP16/14179  **Respondent:** 15601185 / Jane Young  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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

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

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

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

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

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

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

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

**Attached documents:**
**Comment ID:** PSLPP16/14149  **Respondent:** 15601185 / Jane Young  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14154  Respondent: 15601185 / Jane Young  Agent: 

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14159  Respondent: 15601185 / Jane Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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

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

I OBJECT to poor air quality concerns (Policy I3)

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

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

Attached documents:

Comment ID: PSLPP16/14119  Respondent: 15601185 / Jane Young  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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

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

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

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

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

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

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

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

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

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

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

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

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

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

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

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14124</th>
<th>Respondent: 15601185 / Jane Young</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

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

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

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

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14109</th>
<th>Respondent: 15601185 / Jane Young</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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

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

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

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

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

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

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

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

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

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

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14116  Respondent: 15601185 / Jane Young  Agent:

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

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

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

I OBJECT to the Borough Wide Strategy (Policy S2)

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

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

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

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

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

Page 52 of 2988
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPA16/3443  Respondent: 15601217 / Patrick Barrass  Agent:

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

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

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

Comment ID: PSLPA16/3440  Respondent: 15601217 / Patrick Barrass  Agent:

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

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

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

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

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

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

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

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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

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

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

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

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

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

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

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

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

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

Note the following accident data:

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

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

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

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

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

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

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

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

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

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

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

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

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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

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

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

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

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

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

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

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

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

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

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

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

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14142</th>
<th>Respondent:</th>
<th>15601217 / Patrick Barrass</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

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

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

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

**Attached documents:**

---

**Comment ID:** PSLPP16/14172  **Respondent:** 15601217 / Patrick Barrass  **Agent:**

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

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

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

I OBJECT to Policy D3 - Historic environment

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

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

**Attached documents:**

---

**Comment ID:** PSLPP16/14175  **Respondent:** 15601217 / Patrick Barrass  **Agent:**

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D4 - Development in urban areas and inset villages

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

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

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

Attached documents:

Comment ID: PSLPP16/14128   Respondent: 15601217 / Patrick Barrass   Agent:

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

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

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

I OBJECT to the sustainable employment policy (Policy E1)

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

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

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

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

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

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

Attached documents:
### Comment ID: PSLPP16/14133  Respondent: 15601217 / Patrick Barrass  Agent:

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

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

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

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

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

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

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

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

**Attached documents:**

### Comment ID: PSLPP16/14138  Respondent: 15601217 / Patrick Barrass  Agent:

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

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

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

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

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

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

**Attached documents:**

### Comment ID: PSLPP16/14181  Respondent: 15601217 / Patrick Barrass  Agent:
I OBJECT to Policy E6 - The leisure and visitor experience.

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

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

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

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

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

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

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

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

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14166  Respondent: 15601217 / Patrick Barrass  Agent:

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

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

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

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

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

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

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

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

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14178  **Respondent:** 15601217 / Patrick Barrass  **Agent:**

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

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

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

---

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

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

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

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

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

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

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

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

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

Attached documents:

Comment ID: PSLPP16/14148  Respondent: 15601217 / Patrick Barrass  Agent: 

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

---

I OBJECT to poor air quality concerns (Policy I3)

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

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

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

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

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

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

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

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

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

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

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

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14123  Respondent: 15601217 / Patrick Barrass  Agent:

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPP16/14110  Respondent: 15601217 / Patrick Barrass  Agent:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Attached documents:**

---

**Comment ID:** PSLPP16/14115  **Respondent:** 15601217 / Patrick Barrass  **Agent:**

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

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

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

I OBJECT to the Borough Wide Strategy (Policy S2)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: PSLPA16/3444  Respondent: 15601249 / Ann Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

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

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

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

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

Attached documents:

Comment ID: PSLPA16/3441  Respondent: 15601249 / Ann Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

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

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

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

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

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

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

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

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

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

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

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

Note the following accident data:

2010 –2014 from Crashmap data

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

2015

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

2016

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

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

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

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

Attached documents:

Comment ID: PSLPS16/6704  Respondent: 15601249 / Ann Barrass  Agent:

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

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

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

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

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

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

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

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

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

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

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

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

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14141  Respondent: 15601249 / Ann Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14171  Respondent: 15601249 / Ann Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14174  Respondent: 15601249 / Ann Barrass  Agent:
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14126  Respondent: 15601249 / Ann Barrass  Agent:

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the
south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14131  Respondent: 15601249 / Ann Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14136  Respondent: 15601249 / Ann Barrass  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14180  Respondent: 15601249 / Ann Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment “Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in...
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14168 Respondent: 15601249 / Ann Barrass Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14161 Respondent: 15601249 / Ann Barrass Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14165</th>
<th>Respondent:</th>
<th>15601249 / Ann Barrass</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14177  Respondent: 15601249 / Ann Barrass  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14146</th>
<th>Respondent: 15601249 / Ann Barrass</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14152</th>
<th>Respondent: 15601249 / Ann Barrass</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &amp; M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14156</th>
<th>Respondent: 15601249 / Ann Barrass</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to poor air quality concerns (Policy I3)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14121  
Respondent: 15601249 / Ann Barrass  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14112</th>
<th>Respondent: 15601249 / Ann Barrass</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14114</th>
<th>Respondent: 15601249 / Ann Barrass</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; comply with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I need to object to the proposal in the Local Plan to build 1,100 new homes and a secondary school in the Normandy and Flexford area (site 368).

My main concern if this construction goes ahead, is that a pleasant rural community will become an urban sprawl. This area is part of Surrey Hills Area of Natural Beauty, but the wonderful views looking up to, and down from the Hogs Back will disappear.

The wildlife will also disappear as the building work destroys the hedgerows and grasslands which form their natural habitat. The numbers of small mammals, birds and bees will all be heavily reduced. Wildlife in the Thames Basin Heaths Special Protection Area will likewise be severely affected as it is just one kilometre away in Ash and Pirbright.

My second cause for concern is the lack of suitable infrastructure to cope with a development of this magnitude. The roads bordering the site will not cope with the extra traffic which will definitely be generated. Westwood Lane on the west is only a C road, while Glaziers Lane on the east is just an unclassified D road. Both roads have railway bridges which limit the traffic flow. These roads are already very busy, especially during rush hour. The addition of heavy lorries initially to build the development, followed by thousands of cars driven by users of the development, will soon cause gridlock.

So to summarise, please do not let a beautiful rural area, which is a haven to wildlife, become a heavily congested urban sprawl, just because it is a convenient place to build the majority of houses demanded by government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object therefore to the number of developments planned in such a relatively small area. The infra-structure in and around Send and Ripley, can only just about cope at present! An appointment at our local Doctors surgery can mean a wait of well over a week. The local schools are stretched to find places for the local children and then there's the traffic! The roads around Send and Ripley are constantly gridlocked in the morning and the roadways themselves are damaged through volume of traffic and lack of maintenance. With that in mind, how on earth are we going to accommodate another several hundred homes!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14191   Respondent: 15601409 / Adam Wheeler   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of foresight given to the infrastructure required to accommodate all these additional families, where would the children go to school? How would you ever get a Doctors appointment? The roads would be permanently blocked and therefore become even more damaged and dangerous and as I mentioned earlier there is a very limited bus service.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14189   Respondent: 15601409 / Adam Wheeler   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object most strongly to the proposed local plan. I currently live with my family in Send Marsh and commute to Westcott for work every day.

The proposed construction of hundreds of houses in and around Send Ripley Merrow and the Clandons, will create a density of housing and therefore increased traffic and unsustainable pressure on local services that would be unsafe and down right irresponsible.

My main concerns:
* I object to the erosion of the Green belt. The villages of Ripley, Wisley Clandons and Send, are apparently earmarked to lose their Green Belt status. This is outrageous. Property in this area commands high prices, this is because of the location. Residents accepted the inflated price in return for being able to live in a pleasant semi-rural location, with the knowledge that as there was green belt land in the area it would not change too drastically or become over developed!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14193  Respondent: 15601409 / Adam Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If our Green Belt status is removed, thereby allowing unlimited developments, we will no longer be a village, we'll be one sprawling town with no personality or green spaces. Having lived in Istanbul I've seen what happens when people build with no regard to green spaces or future happiness. Don't let it happen here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14190  Respondent: 15601409 / Adam Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that we have been given very little time to digest what the planners have put forward, and put forward our thoughts on the proposals!

I object to the council viewing our villages as the answer to the housing needs of the area. The transport links from Send and Ripley are poor to say the least. The buses run once an hour, so without a car to get to a railway station, or towns such as Woking or Guildford would be very difficult. So how are all these new home owners going to get to work as with the increased traffic no one would get anywhere there'd be total chaos!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLP16/14192  Respondent: 15601409 / Adam Wheeler  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I know I am one of many residents who has raised concerns over what is proposed, I do hope that you will listen to our objections, and see that what you have put forward is totally impractical and threatens to change the whole local environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPS16/6712  Respondent: 15601441 / Valerie Hill  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

As a regular visitor to the area, where many friends live, I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and
many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3450  Respondent: 15601473 / Joseph Fort  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6713  Respondent: 15601473 / Joseph Fort  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6714  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6715  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14201  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14198  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14199  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14200  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14219  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14205  Respondent: 15601473 / Joseph Fort  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14217  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14202  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

    1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14203</th>
<th>Respondent: 15601473 / Joseph Fort</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td><strong>is Sound?</strong></td>
<td>( )</td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong>  </td>
<td>()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &amp; M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Comment ID:</strong></td>
<td>PSLPP16/14204</td>
<td><strong>Respondent:</strong> 15601473 / Joseph Fort</td>
<td><strong>Agent:</strong></td>
</tr>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td><strong>is Sound?</strong></td>
<td>( )</td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong>  </td>
<td>()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I OBJECT to poor air quality concerns (Policy I3)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Comment ID:</strong></td>
<td>PSLPP16/14196</td>
<td><strong>Respondent:</strong> 15601473 / Joseph Fort</td>
<td><strong>Agent:</strong></td>
</tr>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14197  Respondent: 15601473 / Joseph Fort  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual
probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14194  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14195  Respondent: 15601473 / Joseph Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECTION TO “THE GUILDFORD PLAN” – JUNE 2016” (sent by email)

As a very frequent visitor to see my brother, sister-in-law and nephew who live in West Horsley, I am dismayed at the proposals for future housing developments in the West and East Horsley parishes contained in the “Guildford Borough Proposed Submission Local Plan: Strategy and Sites – June 2016” (The Guildford Plan).

The proposal that you can increase the number of households by 35% is hard to comprehend particularly when there seems to have been little or no consideration in “The Guildford Plan” of the effect such a huge increase will undoubtedly have on the local infrastructure and services.

As a Surrey resident myself, I understand the need for building more affordable housing in the County, but the proposals on the scale set out in the Plan are way in excess of what is acceptable and sustainable.

In view of my observations set out above, I strongly object to the proposals set out in the “The Guildford Plan” and urge the Council to have a serious reconsideration about the numbers and sizes of developments proposed and come up with a much more realistic Plan in keeping with the local infrastructure, services and rural setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6721  Respondent: 15601697 / Samantha Tarrant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. This site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4) I object to the disproportionate allocation of housing in this particular part of the Borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure
enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3455  Respondent: 15601761 / Georgina Korrison  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no provision for Garlicks arch so the Plan takes no account of the infrastructure needed for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/14238  Respondent: 15601761 / Georgina Korrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy P1)

I have been a resident in Ripley since 2010 and the weight of traffic has dramatically increased, especially when the surrounding roads and motorways (A3 in particular) are under pressure.

At a time of reduced bus services through Ripley and no train stations nearby, the cars from the extra houses will clog the already busy roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14236  Respondent: 15601761 / Georgina Korrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the not protecting the Green Belt (Policy P2)

I strongly object to removing the villages of Ripley, Clandon and Send from the Green Belt.

In addition the sites of Wisley Airfield and Garlicks Arch must not be removed as their development as it would ruin the local area’s environment visually and environmentally. It would become more urban rather than a green environment, which Ripley is so admired for. As required by the National Planning Policy there are no exceptional circumstances for the above sites being removed from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/14237  Respondent: 15601761 / Georgina Korrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The 13,860 extra houses is not sustainable, my village of Ripley and local villages of Send and Clandon will be damaged, we don’t need these extra houses in our local area. The plan lacks any infrastructure improvements for Garlicks Arch. This development must surely be more suited to an urban area with transport already on hand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6723  Respondent: 15601793 / Daphne and David Annett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Objection to Guildford Borough Council draft Local Plan (June 2016)

We strongly object to the inclusion in the Guildford Borough Council draft Local Plan (June 2016) of Site Allocation A35 namely the Former Wisley Airfield for a new settlement of 2,000 dwellings. For the following reasons:

- The Former Wisley Airfield should NOT be removed from the Green Belt, as it serves a vital role in preventing urban sprawl from London and a development there would create an urban corridor stretching from London to Guildford.
- No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.
- There is ample brownfield land in urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.
- Such a development would have harmful impact on transport, local roads and road safety. The result of an additional 2,000 homes would be an estimated 4,000 additional cars together with other vehicles, including HGVs, to service the development.
The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development – Cobham Village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those already increasingly using local roads for recreational purposes).

There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. Any proposed secondary schooling would add additional congestion.

The lack of suitable public transport. The local rail stations of Effingham and Horsley could not cope with the proposed increase in passenger traffic and car parking is already at capacity. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used – that, or use of stations further north at Weybridge or Walton, would increase congestion and pollution on local roads in Elmbridge.

Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.

Insufficient consideration has been given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

On 8th April 2016, there was unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on the recommendation of its Planning Officers. The Planning Report identified the serious concerns now being highlighted above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/6725  **Respondent:** 15601825 / Claire Billard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Gosden Hill (policy A25) The scale of the development proposal and its potential impact on the A3 and other local roads is a major concern. The provision of a rail link may help to partially alleviate the problem, but the number of houses proposed is far higher than is suitable for the location and unless the development is invisible from the A3 then it will detrimentally affect the appearance of the borough as a predominantly rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/6727  **Respondent:** 15601825 / Claire Billard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch (policy A43) This was a very late and very major change to the Local Plan proposals does appear to have not followed the correct due process so should be removed. The proposal to build circa 400 houses and 7,000sq.m. light industrial/storage, warehousing Green Belt land, lying outside the Send Marsh/Burnt Common village boundary, defies all logic. This area which includes ancient woodland is a refuge for wildlife and a clear separation for the A3 and the village. It was also never considered as a Potential Development Area within the Council’s ‘Issues and Options report’ or identified for development in the 2014 consultation. In 2014 the Council rejected a planning application from ‘Oldlands’ to build 25 houses in this location on sound planning grounds, so the council should not now consider the construction of 400 houses and 7,000sq.metres of employment space there? There is insufficient infrastructure to support such a development. Send Marsh/Burnt Common has one just petrol station with a small shop, one local doctors’ surgery that is full, no schools and the local roads are already filled to capacity especially the Clandon Road. Any development in this area would be totally inappropriate and would be detrimental of Send Marsh/Burnt Common as a village. The housing proposal alone would add a 41% (960) increase to the existing population of 2,341. The proposed would significantly detract from the open countryside aspect and add dramatically to the existing road use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/6726  **Respondent:** 15601825 / Claire Billard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New north and southbound slip-roads to and from the A3 to the A 247 Clandon Road (policy A43a) This proposal will encourage additional traffic along the very narrow, winding A247 Clandon Road and the Send Barns Lane/Send Road leading to Woking, the traffic along both of which are already at capacity. Send village is a ribbon development of housing along both sides of Send Road, so there is no scope to widen it, and where it ends at the Old Woking roundabout none of the connecting roads can be widened to ease congestion because of the existing surrounding buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/14241  **Respondent:** 15601825 / Claire Billard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2). The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity. With a presumption for development within these ‘inset’ areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14240  Respondent: 15601825 / Claire Billard  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2). The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6729  Respondent: 15601857 / Martin Billard  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Gosden Hill (policy A25)

The scale of the development proposal and its potential impact on the A3 and other local roads is a major concern. The provision of a rail link may help to partially alleviate the problem, but the number of houses proposed is far higher than is suitable for the location and unless the development is invisible from the A3 then it will detrimentally affect the appearance of the borough as a predominantly rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Garlick’s Arch (policy A43)

This was a very late and very major change to the Local Plan proposals does appear to have not followed the correct due process so should be removed.

The proposal to build circa 400 houses and 7,000sq.m. light industrial/storage, warehousing Green Belt land, lying outside the Send Marsh/Burnt Common village boundary, defies all logic. This area which includes ancient woodland is a refuge for wildlife and a clear separation for the A3 and the village. It was also never considered as a Potential Development Area within the Council’s ‘Issues and Options report’ or identified for development in the 2014 consultation.

In 2014 the Council rejected a planning application from ‘Oldlands’ to build 25 houses in this location on sound planning grounds, so the council should not now consider the construction of 400 houses and 7,000sq.meters of employment space there?

There is insufficient infrastructure to support such a development. Send Marsh/Burnt Common has one just petrol station with a small shop, one local doctors’ surgery that is full, no schools and the local roads are already filled to capacity especially the Clandon Road.

Any development in this area would be totally inappropriate and would be detrimental of Send Marsh/Burnt Common as a village. The housing proposal alone would add a 41% (960) increase to the existing population of 2,341.

The proposed would significantly detract from the open countryside aspect and add dramatically to the existing road use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This proposal will encourage additional traffic along the very narrow, winding A247 Clandon Road and the Send Barns Lane/Send Road leading to Woking, the traffic along both of which are already at capacity. Send village is a ribbon development of housing along both sides of Send Road, so there is no scope to widen it, and where it ends at the Old Woking roundabout none of the connecting roads can be widened to ease congestion because of the existing surrounding buildings.

This ill-conceived plan to enable major development at Gosden Hill and Wisley completely fails to take account of the serpentine configuration of the Clandon Road and of the inability to improve the traffic flow along it and the Send Road because of the proximity of existing housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• The number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).

The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3458  Respondent: 15601953 / Stephen Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Amount of new housing far exceeds local need.
• Housing density excessive when compared with existing development.
• Would transform the Horsleys into a sizable town, something for which no case is made.
• No local support.
• Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
• Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
• Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
• No account taken of additional impact of Wisley Airfield site on Horsleys.
• Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.

• Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
• Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
• Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
• Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6734  Respondent: 15601953 / Stephen Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14270  Respondent: 15601953 / Stephen Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Poor monitoring.
- No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14271  Respondent: 15601953 / Stephen Yandle  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

| Comment ID: PSLPP16/14272 | Respondent: 15601953 / Stephen Yandle | Agent: |

<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and ‘Disneyfying’ public historic assets.</td>
</tr>
<tr>
<td>- Doesn’t ban development near historic assets.</td>
</tr>
<tr>
<td>- Ignores NPPF 126, 131, 132, 133.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

| Comment ID: PSLPP16/14273 | Respondent: 15601953 / Stephen Yandle | Agent: |

<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14263</th>
<th>Respondent:</th>
<th>15601953 / Stephen Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Poor evidence base.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Too much encouragement to low added-value employment that’s needed elsewhere in the country.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Fails to differentiate this from appropriate rural business.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Too much encouragement of warehousing, for which Guildford is too congested.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14264</th>
<th>Respondent:</th>
<th>15601953 / Stephen Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
• Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
• No policy of opposing reduction in rural hotel capacity.
• No definition of what added value interventions by Council can make to normal visitor market mechanisms.
• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14268   Respondent: 15601953 / Stephen Yandle   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.

• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14269   Respondent: 15601953 / Stephen Yandle   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14256  Respondent: 15601953 / Stephen Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Policy doesn’t set any constraints on building.
• Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14257  Respondent: 15601953 / Stephen Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
• The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

• Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
• Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):</td>
</tr>
<tr>
<td>• Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.</td>
</tr>
<tr>
<td>• Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.</td>
</tr>
<tr>
<td>• Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14276</th>
<th>Respondent: 15601953 / Stephen Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Just a list of generic measures, not related to real life or the particularities of Guildford.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. I.e. most residents!</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14277</th>
<th>Respondent: 15601953 / Stephen Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Answer (if comment is on questions 1-7 of the questionnaire): ()

- No teeth. Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14260  Respondent: 15601953 / Stephen Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14261  Respondent: 15601953 / Stephen Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14262  Respondent: 15601953 / Stephen Yandle  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14252  Respondent: 15601953 / Stephen Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14255  Respondent: 15601953 / Stephen Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• Numbers based on growth and demographic data now invalidated by Brexit.
• No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
• 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.

• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.

• High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6732  Respondent: 15601985 / Sally Clarke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was born, schooled and brought up in the Guildford area.

I wish to add my strong OBJECTION to the site allocation plans to the A26 Blackwell Farm.

The knock-on effect of traffic build up and general disruption to the area does NOT bear thinking about.

Please accept this email as an objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6733  Respondent: 15602049 / Fiona Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

---
<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

Dear Sirs,

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Attached documents:

Comment ID: PSLPA16/3460  Respondent: 15602113 / Janet Woodward  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41: • Amount of new housing far exceeds local need. • Housing density excessive when compared with existing development. • Would transform the Horsleys into a sizable town, something for which no case is made. • No local support. • Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites. • Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt. • Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding. • No account taken of additional impact of Wisley Airfield site on Horsleys. • Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6739  Respondent: 15602113 / Janet Woodward  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A25 Gosden Hill Farm – massive overdevelopment of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6740  Respondent: 15602113 / Janet Woodward  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I OBJECT TO site A35 Wisley Airfield – 2000 homes that are totally inappropriate and unsustainable development in the Green Belt. This is a hugely disproportionate amount of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6736   Respondent: 15602113 / Janet Woodward   Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I OBJECT TO the late inclusion of site A43 Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6737   Respondent: 15602113 / Janet Woodward   Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I OBJECT TO site A43a the on and off ramp at Burnt Common/Clandon – this will increase traffic problems, not help them! There will be a catastrophic increase in traffic resulting from spreading new housing estates across the area. Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan. • Excessive housebuilding in countryside not supported by any funding or provision for infrastructure. • Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure. • Draft CIL scale discourages use of brownfield land first. • No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local
roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/6738 **Respondent:** 15602113 / Janet Woodward **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A45 The Talbot – This is overdevelopment in a conservation area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/6741 **Respondent:** 15602113 / Janet Woodward **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A57 The Paddocks – 4 traveller pitches. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/14282 **Respondent:** 15602113 / Janet Woodward **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY P2 – Green Belt. I object to the insetting of 14 villages from the Green Belt, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages. Essentially, all the villages within the Green Belt are now vulnerable to extensive further development. Green Belt is supposed to be protected as a matter of national and local policy, but this policy seeks to justify development in a supposedly protected area, in breach of local manifesto commitments and contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14283  Respondent: 15602113 / Janet Woodward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO any ‘in-setting’ (ie removal) of any villages from the Green Belt. No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions. • Impact of Green Belt development on local agriculture ignored. • Impact on rural leisure and tourism ignored. • Impact on flood control ignored. • Impact on carbon sink and knock-on effects for air pollution and climate change ignored. • Impact on biodiversity ignored. • Impact on natural heritage ignored. • Impact on water catchment ignored. • Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored. • Impact on rural business (e.g. mineral mining, film making) ignored. • Impact on natural landmarks and views ignored. • Harm to public health and wellbeing (physical, psychological) ignored. • Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14281  Respondent: 15602113 / Janet Woodward  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO the local plan as the development proposed is not sustainable. (POLICY S1) • No guidelines for applying it to planning. • No statement of how economic, social and environmental impacts should be balanced. • No mention of Green Belt, Guildford’s greatest legacy and no commitment to protecting it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6747  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A26 Blackwell FarmThere is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital
and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to 'enable delivery'. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy D1 Making better places. I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Policy D2 Sustainable design, construction and energy. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14344  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D4 Development in urban areas and inset villages

This policy does not address the opportunity for building in the urban area. The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline. THE BROWNFIELD OPPORTUNITY Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land. In response to the detailed objections received in the
 Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space.GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14321  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E1 sustainable employment. I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/
R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14323  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E2 location for new employment floor space I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%) The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14325  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to Policy E3 maintaining employment capacity I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential). I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound. Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic. The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015). To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes. To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised. London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14327  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E4 Surrey research Park. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being the location of choice for new innovative enterprises. I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence,
robotics and super-manufacturing Monitoring indicators should include new start-ups and new patents created Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park The Surrey Research Park currently extends to 65,000 sq m There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis The ELNA 2015 calculated annual floor space demand is 0.7% The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14329</th>
<th>Respondent: 15602177 / Julia Hunt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E5 Rural Economy In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14331</th>
<th>Respondent: 15602177 / Julia Hunt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. 

The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

THE TOWN CENTRE OPPORTUNITY

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14308</th>
<th>Respondent:</th>
<th>15602177 / Julia Hunt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
</tbody>
</table>
I object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14310  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14312  Respondent: 15602177 / Julia Hunt  Agent:
I object to policy H3 Rural Exception Homes. This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceeding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan. The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton. The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided. The following comments regarding the strategic sites are taken from the SHAR: Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road/Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSC through the development (para 4.7.3) Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8). Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14) Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Woodland Lane, B3000 junction, but an increasing at the Puttenham Hill/ Millbrook junction. Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction). Slyfield – there are no remark relating to SAR, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will
impact on the A320 and Clay Lane. Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14348  Respondent: 15602177 / Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy i2 Supporting the Department of Transport’s “Road Investment Strategy” This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14350  Respondent: 15602177 / Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I3 Sustainable transport for new developments. This is another aspirational policy, not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport. The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths. The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK. The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times. Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town. I like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services. The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie. Cost of housing will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14352  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I4 green and blue infrastructure. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting. ABSENCE OF POLICY ON RIVER WEYI object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that
development within the River Wey corridor will only be permitted provided that: It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest; The special character of the landscape and townscape in the corridor is protected or improved; Views both within and from the corridor which contribute to this special character are protected or improved; Where appropriate, public access is provided to and along the River and the Navigations. The Nature Conservation value of the site is protected or improved.

GREEN BELT SITES

I object to ALL Green Belt sites allocated for development in the local plan object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14314  Respondent: 15602177 / Julia Hunt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they… ““All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate. Finally, I would like to see a clause which
gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14316   Respondent: 15602177 / Julia Hunt   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 green belt This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14319   Respondent: 15602177 / Julia Hunt   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14303   Respondent: 15602177 / Julia Hunt   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14305  Respondent: 15602177 / Julia Hunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance.

The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view
in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”.

This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”.

It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA.

The report concluded amongst other matters that:

The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:
1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.

2. there should be no increase for affordability above basic demographic change.

3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.

4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” – Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply.

Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN).
However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN, of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: S1LP16/1654 Respondent: 15602177 / Julia Hunt Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks
no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment

I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is
extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collection.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have *An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF*. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst
bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA)

I Object

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

**The Land Assessment**

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

**Green Belt & Countryside Study**

I object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1656</th>
<th>Respondent:</th>
<th>15602177 / Julia Hunt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high’s of 68 using National bias adjustment.

Clr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations.

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford's need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a
more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit-June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Green belt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of inserting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and
the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

*Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1662  **Respondent:** 15602177 / Julia Hunt  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

*I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.*

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1664  **Respondent:** 15602177 / Julia Hunt  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Wisley Airfield being developed with over 2,000 new houses. It is too many in a very small village of outstanding natural beauty.

I object to this development on the grounds that roads are narrow and already have too much traffic from A3 and M25. I am a regular visitor to this area with my wife's parents in the village and myself having been brought up in Wisley.

No Schools could cater for this many homes and Howard of Effingham and other surrounding schools already have waiting list. This will change the whole area and I strongly object to this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Secondly, I specifically object to policies A36, A37, A38 A39, A40 and A41. The proposed developments will utterly change, irrevocably, the nature and character of the villages of East and West Horsley. 

What is being proposed - more than 500 homes and a 35% increase - changes the Horsley’s from a village into a small town overnight. To my mind this is crazy, insensitive, unjustified and sadly, plain wrong.

Also, the scale of the proposed developments, and % increase in the housing stock, is utterly out of proportion with what is being proposed elsewhere in the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Finally, I also object to Policy A35 (WISLEY AIRFIELD). I don’t believe this should be in the plan for all the same reasons the Planning Committee rejected the ?identical recent proposal by Wisley Investment Properties. ?This is not a brownfield site as stated – only 15% of it. Anyone that has been on the A3/M25 Junction recently will know how impossible it is to join the motorway with existing traffic volumes, access is confined to inadequate narrow lanes and there is no existing public transport and no train stations in the locality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14339  Respondent: 15602273 / Phillip Herrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fourthly, the infrastructure is already overloaded and no consideration has been given to already overstretched medical and educational facilities nor to the reality of what the extra housing and cars means for the existing community - in terms of congestion, pollution and quality of life - all of which would be degraded by these plans. On this basis too I object to the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14338  Respondent: 15602273 / Phillip Herrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Thirdly, I object to the erosion of the Greenbelt - these proposals do not meet the “exceptional circumstances” requirements. It is the role of this generation of leaders to protect the green belt for the next generation, not destroy it.

I note with interest that the Conservative Party manifesto at the 2015 General Election committed a Conservative Government to “prioritise brownfield development”.

It said: “We will ensure that local people have more control over planning and protect the Green Belt.

They said they will encourage more neighbourhood planning and protect the Green Belt. “Neighbourhood planning gives more power to local people, allowing them to play a much stronger role in shaping their areas.”

I assume that, having been voted in on this basis, that pledge will be honoured.

The scale and location of the proposed developments in the Horsley’s are not on and I object to them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14342  Respondent: 15602273 / Phillip Herrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would urge you to remember that “place” is important, it is deeply ingrained in our human psyche, and it would be dangerous for political leaders to overlook that fact. When people feel ignored, feel they are being trodden over roughshod, in the end they rebel - as has been demonstrated in the EU referendum. When elections come, people won’t forget.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14335  Respondent: 15602273 / Phillip Herrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Firstly, the overall number of new homes proposed across the borough seems grossly inflated to me, not reflecting projected population growth or demand. I am sure that, post-Brexit, the Borough Council would want to take time in reassessing many of their growth assumptions, which seemed flawed even before the Referendum.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPA16/3466  **Respondent:** 15602401 / Ian Pollard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**House Building Programme:** I note that the house building proposals represent a 25% increase in the housing stock, whilst the Office of National Statistics projects a population increase of only 15% over the equivalent period. This anomaly is concerning and requires further justification before it can be properly evaluated, and this is particularly so when taken together with the Infrastructure concerns noted above.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/14353  **Respondent:** 15602401 / Ian Pollard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Infrastructure Proposals:** The plan appears to lack any specific infrastructure proposals to address the existing Road Surface Conditions, Road Congestion, Road Drainage, Primary School Provision, and Medical Facilities, let alone address the obvious increased strain on all these issues that will be imposed by the proposed housing developments.

Myself and family members use the roads to commute to work in London, using the A3, and to North West London, using the M25. There are already significant congestion issues arising at M25 junction 10, particularly during term times, and a significant expansion of traffic threatens to gridlock the road network quickly. This problem is exacerbated by the exceedingly poor nature of most of the roads, being both narrow for passing and beset with potholes creating danger. During heavy rainfall many of the main arterial roads leading in and out of the village become flooded.

The fundamental nature of the current road infrastructure is primarily rural, with several adopted roads and many private roads that have been established and maintained by the residents. An impact assessment of the effect of significantly
increased traffic volumes would therefore seem to be essential to any Local Plan and its omission is therefore a real concern that fundamentally undermines the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14354  Respondent: 15602401 / Ian Pollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Greenbelt Protection: I note that approximately 65% of the proposed developments will involve breaching current Green belt boundaries, and this appears to conflict with the Council's own policies. The compromise of Greenbelt boundaries is also a matter worthy of National concern, and at least worthy of a collective and integrated consideration by London and South East Boroughs. Any proposals that potentially impact upon the existing Metropolitan Greenbelt should be subject to much more detailed environmental and socio-economic impact assessment, and Stakeholder consultation, than is contained within the current Local Plan proposals

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14356  Respondent: 15602401 / Ian Pollard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The above principle reasons are - in my view - sufficiently fundamental to undermine the integrity and adequacy of the current Proposed Submission Local Plan.

Detailed proposals within the plan - particularly including the proposed housing development of Land at the site of the former Wisley Airfield - therefore lack foundation, and if permitted to proceed will have unpredicatable and irreversible effects upon the character and viability of the area as a functioning and stable community. I therefore STRONGLY OBJECT to these proposals

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

To whom it may concern

In regards to the planning consultation for the area of Send and in particular the Send Hill proposal I wish to strongly object on the following grounds.

The proposal is not in keeping and sympathetic to the area as stated. The proposed is an over development squeezing far too many new small homes in a very limited space. 40 new homes would mean a prospected 80 number cars. Where would 80 cars park? This additional traffic would have a vast negative impact to the Send Hill road and again not be “sympathetic to the surrounding area”. This land is currently used by local residents for recreational walking and nature observing. Wood peckers, Owl’s Bats and badgers are all regularly seen here along with many other forms of wild life such as the protected May bug. The loss of their habitation could never be sympathetically catered for and would clearly be detrimental to their survival. The land is currently used as common land and should remain so as this is actually the only green open space for the local residents to use. The addition of two traveller’s pitches would unfortunately immediately degrade the neighbourhood and again I do not see how anyone can argue that this is in keeping with the local area and its residents. Send villages road network and infrastructure is already at a capacity that exceeds that of the size of the village current road network as Send and its back road are used on mass as a trunk road through into Woking and beyond.

I wish to add further notes:

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.
2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
3. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

4. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

5. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

6. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

7. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

8. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

9. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

10. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

11. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

12. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3882  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal is not in keeping and sympathetic to the area as stated. The proposal is an over development squeezing far too many new small homes in a very limited space. 40 new homes would mean a prospects 80 number cars. Where would 80 cars park? This additional traffic would have a vast negative impact to the Send Hill road and again not be “sympathetic to the surrounding area”. This land is currently used by local residents for recreational walking and nature observing. Wood peckers, Owl’s Bats and badgers are all regularly seen here along with many other forms of wild life such as the protected May bug. The loss of their habitation could never be sympathetically catered for and would clearly be detrimental to their
survival. The land is currently used as common land and should remain so as this is actually the only green open space for the local residents to use. The addition of two traveller’s pitches would unfortunately immediately degrade the neighbourhood and again I do not see how anyone can argue that this is in keeping with the local area and its residents. Send villages road network and infrastructure is already at a capacity that exceeds that of the size of the village current road network as Send and its back road are used on mass as a trunk road through into Woking and beyond.

I wish to add further notes:

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.
2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6751  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7251  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7250  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

2. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

10. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7249  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7252  Respondent: 15602529 / Darren Lambert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16251  Respondent: 15602529 / Darren Lambert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14383  Respondent: 15602529 / Darren Lambert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16250   Respondent: 15602529 / Darren Lambert   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14384   Respondent: 15602529 / Darren Lambert   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16249  Respondent: 15602529 / Darren Lambert  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16252  Respondent: 15602529 / Darren Lambert  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1800  Respondent: 15602529 / Darren Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3469  Respondent: 15602561 / Jonathan Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3470  Respondent: 15602561 / Jonathan Clark  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6758  Respondent: 15602561 / Jonathan Clark  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for its removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding.
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14403</th>
<th>Respondent: 15602561 / Jonathan Clark</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14407</th>
<th>Respondent: 15602561 / Jonathan Clark</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14411</th>
<th>Respondent: 15602561 / Jonathan Clark</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14405</th>
<th>Respondent: 15602561 / Jonathan Clark</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

---

Comment ID: PSLPP16/14392  Respondent: 15602561 / Jonathan Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It has been brought to my intention that a number of new housing developments are planned and it is the intention that many local villages are to be "inset" or removed from the Green Belt, this must not happen, the local villages are part of our National Heritage and once they are gone they can never be brought back, the Green Belt was a defining moment in planning and should be preserved at all costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14396  Respondent: 15602561 / Jonathan Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14400  Respondent: 15602561 / Jonathan Clark  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

### Comment ID: PSLPP16/14394  Respondent: 15602561 / Jonathan Clark  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

### Comment ID: PSLPP16/14402  Respondent: 15602561 / Jonathan Clark  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3474  Respondent: 15602625 / Margaret Lambert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In regards to the planning consultation for the area of Send and in particular the Send Hill proposal I wish to strongly object on the following grounds.

The proposal is not in keeping and sympathetic to the area as stated. The proposed is an over development squeezing far too many new small homes in a very limited space. 40 new homes would mean a prospected 80 number cars. Where would 80 cars park? This additional traffic would have a vast negative impact to the Send Hill road and again not be “sympathetic to the surrounding area”. This land is currently used by local residents for recreational walking and nature observing. Wood peckers, Owl’s Bats and badgers are all regularly seen here along with many other forms of wild life such as the protected May bug. The loss of their habitation could never be sympathetically catered for and would clearly be detrimental to their survival. The land is currently used as common land and should remain so as this is actually the only green open space for the local residents to use. The addition of two traveller’s pitches would unfortunately immediately degrade the neighbourhood and again I do not see how anyone can argue that this is in keeping with the local area and its residents. Send villages road network and infrastructure is already at a capacity that exceeds that of the size of the village current road network as Send and its back road are used on mass as a trunk road through into Woking and beyond. We understand that that there are already plans to builder a number of homes at he bottom of Send Hill within the existing School grounds of St Bede’s. So the proposed is an over development of this immediate area.

I wish it to be noted that this is yet another attempt to over develop this area. Would you please advise when will the council stop threatening the residents of Send Hill?
I wish it to be noted that the Council has subjected this community to far too much repeated duress due to these numerous and repeated threats / attempts to ruin the local area and its green belt countryside. This has many detrimental impacts to those subjected to this process such as added stress, mental health certainly to the vulnerable and elderly. The council have a moral duty here to the residents of Send Hill of which it is clearly treating unfairly.

I am sure no one would object to sensible planning or development of which this is clearly not.

I wish to add further notes:

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

3. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

4. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

5. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

6. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

7. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

8. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

9. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

10. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

11. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

12. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoiled. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The proposal is not in keeping and sympathetic to the area as stated. The proposed is an over development squeezing far too many new small homes in a very limited space. 40 new homes would mean a prospected 80 number cars. Where would 80 cars park? This additional traffic would have a vast negative impact to the Send Hill road and again not be “sympathetic to the surrounding area”. This land is currently used by local residents for recreatonal walking and nature observing. Wood peckers, Owl’s Bats and badgers are all regularly seen here along with many other forms of wild life such as the protected May bug. The loss of their habitation could never be sympathetically catered for and would clearly be detrimental to their survival. The land is currently used as common land and should remain so as this is actually the only green open space for the local residents to use. The addition of two traveller’s pitches would unfortunately immediately degrade the neighbourhood and again I do not see how anyone can argue that this is in keeping with the local area and its residents. Send villages road network and infrastructure is already at a capacity that exceeds that of the size of the village current road network as Send and its back road are used on mass as a trunk road through into Woking and beyond. We understand that that there are already plans to builder a number of homes at he bottom of Send Hill within the existing School grounds of St Bede’s. So the proposed is an over development of this immediate area.

I wish it to be noted that this is yet another attempt to over develop this area. Would you please advise when will the council stop threatening the residents of Send Hill?

I wish it to be noted that the Council has subjected this community to far too much repeated duress due to theses numerous and repeated threats / attempts to ruin the local area and its green belt country side. This has many detrimental impacts to those subjected to this process such as added stress, mental health certainly to the vulnerable and elderly. The council have a moral duty here to the residents of Send Hill of which it is clearly treating unfairly.

I am sure no one would object to sensible planning or development of which this is clearly not.

I wish to add further notes:

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
3. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

4. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

5. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

6. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

7. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

8. I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

9. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

10. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

11. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

12. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

13. I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

14. I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

15. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

16. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14424</th>
<th>Respondent: 15602625 / Margaret Lambert</th>
<th>Agent:</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6765  Respondent: 15602721 / Paige Marskell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object as a local resident to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to
be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling.
2. The increased volume of car traffic. A proposed development of 2,068 homes.
3. The congestion this traffic will cause on the narrow rural roads in Ockham.
4. The danger this traffic will be to local cyclists and pedestrians.
5. The increase in the already severe congestion on the Strategic Road Network.
6. The lack of suitable public transport. The local rail stations of Effingham.

The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.

would result in an estimated 4,000 additional cars on the roads

the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them) the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8 the April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objection to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation 35 - for the phased development of a new settlement of up to 2100 dwellings

Dear Sirs,

I would like to register my objection to the above draft local plan for the following reasons:

**Green Belt:**

I object to the proposals to build on Green Belt land and understand that green belt boundaries can only be altered in exceptional circumstances and I do not believe that there has been any demonstration of the special circumstances required in this case. The development would be a massive encroachment of the Metropolitan Green Belt and would as I understand it be inappropriate development (as defined by law) within that.

There are many brownfield sites which are more appropriate for redevelopment which are currently not being utilised.

I object to the removal of Wisley Airfield from the Green Belt and believe the protection of green belt land to be important for many different reasons and feel strongly that this proposed development would have an adverse impact on the surrounding area: it would lead to the urbanisation of a rural area of which there are not many near and around London, it would have a negative impact on wildlife, in particular in leading to the loss of habitat for a number of protected and endangered species and would lead to a loss of green space currently enjoyed by walkers, horse riders and cyclists amongst others.

Additionally, I am concerned that election manifesto promises to the electorate are being ignored.

**Impact on the local area:**

I have lived on Ockham Lane for 10 years and have seen the number of new homes and volume of traffic increase substantially in the area during this time. The proposed housing density and multi-storey buildings in these proposals are out of keeping with the surrounding rural area and there is already an obvious strain on the local infrastructure with problems related to roads, traffic and parking and severe pressure on local services including those provided by doctors, dentists, shops and schools.

I am concerned that insufficient consideration has been given to the ability of the local infrastructure to cope with the additional homes and the associated developments and vehicles that will come with them, the detrimental impact on road safety and the negative impact on current residents within the area. The major increase in traffic to and from the site is not compatible with the narrow country lanes in the area and will exacerbate the current traffic issues and congestion. Traffic is already frequently at a standstill in the area and such a significant increase in the volume of cars can only lead to further traffic issues in an already over-crowded area.

I object to the proposed number of houses, the disproportionate allocation of housing and housing density planned for this part of the borough which is out of keeping with the rural area. In light of the recent Referendum and the UK's forthcoming withdrawal from the EU it is clear that there will be smaller numbers of migrants coming to the UK and therefore less pressure on housing and a reduced need to build new homes.
Consideration does not appear to have been given to the negative impact of such a substantial increase in population to the existing residents of Cobham, Downside and Hatchford. I am concerned that the impact on light pollution, traffic and infrastructure has been significantly underestimated and that suggested measures in mitigation are inadequate.

Additionally, insufficient consideration appears to have been given to the environmental and ecological value of the site (site of special scientific interest (SSSI) etc) and air quality concerns and the serious concerns raised by many authoritative sources including Highways England, Thames Water and the Environment Agency amongst others.

Other concerns:

I am concerned by the fact that a developer has been trying to gain planning permission for these exact proposals for several years and that it is therefore expedient for these original proposals to be utilised, rather than this site being selected, objectively, as an appropriate site for development. I am concerned that the council is now putting these proposals forward having vigorously and unanimously objected against them only two or three months ago citing many of the serious concerns I and other local residents are raising in our objections.

I am concerned about the fact that these plans do not meet the needs and wishes of the local communities as evidenced through the Ockham Parish Plan and the unacceptable level of stress that these and the previous proposals have placed on many local residents for many years.

In summary, I am concerned that this is not the right place for additional housing and development and that the impact and above issues have not been properly thought through and are unacceptable to those living in the area. I would be grateful if these concerns could be taken into account and hope that the former Wisley Airfield will be removed from the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3477   Respondent: 15602785 / Tony Hodges   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Over the past years considerable houses have been built, both villages, but at a moderate rate. This has resulted in turning a peaceful place, into a busy and at times a congested and much noisier place to live. Without any major improvements in the roads and services, in particular the amount of car parking available near the shops.

Whilst accepting the need for some continued piecemeal small scale developments, the proposals for the size of developments you propose, are unacceptable if the village is to remain an attractive place to live.

You have not provided the reasons for the removal of the Horsleys from the GREEN BELT, other than your own drive to met unrealistic Government targets. We are well aware of your proposals for other near by sites, which if proceeded with will place further strain on the roads and other services in this area. Only the other day I could not make a appointment at the Surgery without a six day wait to see a doctor

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6767</th>
<th>Respondent:</th>
<th>15602817 / Paul Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6766</th>
<th>Respondent:</th>
<th>15602817 / Paul Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14440</th>
<th>Respondent:</th>
<th>15602817 / Paul Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/14433</td>
<td>Respondent: 15602817 / Paul Douek</td>
<td>Agent:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------------------</td>
<td>---------------------------------</td>
<td>-------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

GBC has not published any details as how the 693 houses figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14430</th>
<th>Respondent: 15602817 / Paul Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14431  Respondent: 15602817 / Paul Douek  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14436  Respondent: 15602817 / Paul Douek  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/14438  Respondent: 15602817 / Paul Douek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14441  Respondent: 15602817 / Paul Douek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3481  Respondent: 15603201 / Stephanie Hinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Page 208 of 2988
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my objections to the proposed draft plan and the removal of East and West Horsley from the Green Belt. Detailed Objections below:-

**Transport**

I object to the draft local plan because of the strain it would put on the rail service. I use the train into London regularly and they are already very crowded before 8.30am in the mornings. The trains would not be able to cope with the increase in passengers with the proposed development. In addition you already struggle to park in the station car park at Horsley and this will only get worse. There is currently nowhere to extend this car park so it will just be nightmare trying to use the train.

**Traffic & Parking**

I object to the draft local plan because of the increase in traffic and the strain put on the road infrastructure and and parking. A lot of local roads are already in a poor condition and increased traffic will put additional strain on them. Parking at Horsley & Effingham junction stations (which is already at capacity), the shops, medical centre and at the village halls will all be adversely affected. I already struggle to park at the medical centre for some appointments and have had to park ‘unauthorised’ at the East Horsley village hall or in a side road.

**Doctors Services**

I object to the draft local plan because of the strain that will be put on the Medical Centre. It is very difficult to get an appointment at short notice already and the proposed increase in houses and consequently people will exacerbate the situation.

**Loss of Green Belt land:**

I object to the removal of East and West Horsley from the Green Belt because this is a beautiful area of surrey and if we continue to build on our countryside it won’t be many decades before we have none left. Getting out in the countryside has really good health benefits both mentally and physically, turning East and West Horsley into a built up area will have an adverse affect on the lives of all the people who live here.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Letter of Objection East & West Horsley Draft Local Plan

I would like to register my objections to the proposed draft plan and the removal of East and West Horsley from the Green Belt. I have detailed my objections below:

**Loss of Green Belt land**

I object to the removal of East and West Horsley from the Green Belt because it is simply not necessary, and it would change the nature and feel of the villages. The Green Belt was created for a reason, to provide a break from the ever growing conurbation of London and to provide a natural area to promote wildlife for all to enjoy. There is still a need for this. The area is used extensively for walkers and cyclists already and the countryside needs to remain open for these activities.

**Doctors Services**

I object to the draft local plan because the doctors’ surgery in East Horsley is already pretty much at capacity and adding more patients would result in unacceptable delays for appointments and service, possibly leading to the threat of life.

**Transport**

I object to the draft local plan because there simply isn’t capacity on the rail network to satisfy the expected needs of new commuters. The station car park is at capacity and many rush-hour trains are already close to full.

**Traffic & Parking**

I object to the draft local plan because the size and capacity of the roads isn’t capable of coping with the additional traffic caused by additional housing. Extra local traffic would cause further pot-holes to the already worn roads. Traffic at rush-hour/school times is already causing queuing at main junctions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7414</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- I object to the figure of 693 houses per annum in the borough being too high (Appendix D). We should not be overbuilding in an area which is already congested. GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation. In any case, the request is very worrying.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7416</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to development in areas at risk of flooding (Policy P4). The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years. Flooding has been a particular concern in 2013 and 2015, with considerable damage to properties in the areas. I do not want this exacerbated.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
- I object to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43) in the plans. Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the Draft Local Plan Infrastructure schedule does not provide for this site at all.

- I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). Damage will be caused to the ancient woodland of oak trees at Garlick's Arch site (A43) proposal, and the loss of green space and amenity.

- I object to the proposed Infrastructure Schedule (Appendix C). There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

- I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5). The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7415</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable and puts pressure on already over-crowded but narrow country lanes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14469</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3). Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14472</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5). The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16479</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). There is no question that this will cause more congestion to the villages of Ripley and Send, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic. This is a massive concern as today I live off Ripley and am already concerned about the level of traffic, in particular at peak hours. The traffic queues are already unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16482</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the lack of proper infrastructure planning for sites (Policy II). The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools? I have read other peoples concerns in this regards and can only agree.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16483  Respondent: 15603297 / Rony Douek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12). I have already commented on this above. Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place. This is the Green Belt and should be protected from further development, especially as it is already quite overbuilt for being countryside.

I request that you take note of my objections and look forwards to receiving an update on the deliberations on this matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16481  Respondent: 15603297 / Rony Douek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object to poor air quality concerns (Policy 13). The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health. Already the air quality is already affected by the vicinity of the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16478</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

- I object to not protecting the Green Belt (Policy P2). I object and find it completely unacceptable to remove Ripley, Send and Chandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43). These are all critical for the local communities and the beauty of the area. It is also my understanding that there are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed. This cannot be granted without the consent of the local community.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14466</th>
<th>Respondent: 15603297 / Rony Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

- I object to development in areas at risk of flooding (Policy P4). The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years. Flooding has been a particular concern in 2013 and 2015, with considerable damage to properties in the areas. I do not want this exacerbated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Local plan being proposed for Guilford in 2016 for the following reasons, which I know are shared by many local residents:

- I object to the local plan as the development proposed is not sustainable (Policy S1). In particular, the volume of proposed housing will very clearly damage local communities especially in Ripley and Send and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. I have a particular concern about the lack of facilities and pressure to force more primary schools, doctors and dentists on the local community. Moreover, I expect there to be thousands of extra cars going through the villages with no possibility of significant improvements to local roads. How can this be considered acceptable??

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY A35 (WISLEY AIRFIELD): • Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. • Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application). • Unacceptable Conservative Party links between the developers and the Council. • No Green Belt “exceptional circumstances” presented. • Not a brownfield site as stated – only 15% of it. • Proposed SCC waste site ignored. • Loss of farming land. • Too near RHS Wisley and Thames Basin Heath SPA. • SANG would harm on SPA. • Will aggravate traffic jams at A3 roundabout and M25 Junction 10. • Unacceptable increase in air pollution. • No existing public transport and stations miles away. • No proper traffic data. • Housing density far too great. • Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings. • Access confined to inadequate narrow lanes. • Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole. • Major impact on neighbouring villages, especially Ripley, Send and the Horsleys. • No assessment has been made of the collective impact on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7266  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to A43 Garlick’s Arch – the site floods and is covered in ancient woodland. The industrial space is not needed and if necessary could be accommodated at Slyfield. With proper use of brownfield sites this Green Belt site is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7267  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to A43a - the on and off ramp at Clandon – this will increase traffic problems in the villages, not help them, and increase the speed and density of the traffic through our villages and past local schools, as well as increase noise and pollution levels which are already at excessive levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the development of 40 houses and 2 travellers pitches at Send Hill – this is an unsuitable location due to the narrow single access country road. The subsoil of the land is documented as unsafe landfill.

- Amount of new housing proposed far exceeds local need.
- Housing density excessive when compared with existing development.
- Would transform Ripley and Send into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 4 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on surrounding villages.
- Extension of settlement boundaries too permissive.

- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
- Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsites, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
- Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to A45 the Talbot – this is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16279  Respondent: 15603361 / Ann Watkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT TO POLICY D1 (BETTER PLACES): • Poor monitoring. • No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16280  Respondent: 15603361 / Ann Watkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC): • Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16281  Respondent: 15603361 / Ann Watkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT): • Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets. • Doesn’t ban development near historic assets. • Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES) • No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes. • Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt. • Objectives for inset villages cancelled out by plans for excessive housing growth there. • Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY E1 (EMPLOYMENT):

• Poor evidence base.

• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16272</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE): • Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14499</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK): • Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose). • No cost/benefit analysis of harm to Green Belt involved in extending research park. • Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16274</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E5 (RURAL ECONOMY): • Incompatible with high housing numbers proposed for rural areas elsewhere in the plan. • Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character. • Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments. • Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16275  Respondent: 15603361 / Ann Watkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE): • Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones. • No policy of opposing reduction in rural hotel capacity. • No definition of what added value interventions by Council can make to normal visitor market mechanisms. • No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier. • No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16276  Respondent: 15603361 / Ann Watkins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E7 (TOWN CENTRE): • No statement in policy wording of value of Guildford’s rural setting and views. • No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans. • Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration. 4 • No brownfield register. • Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston. • No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16277  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E8 (DISTRICT CENTRES): • Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub. • No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16278  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E9 (LOCAL CENTRES): • No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14486  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 (HOMES FOR ALL):
• Policy doesn’t set any constraints on building. • Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors. • Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation. • Lets University of Surrey off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16265</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 (HOMES FOR ALL):
• Policy doesn’t set any constraints on building. • Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors. • Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation. • Lets University of Surrey off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14487</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY H2 (AFFORDABLE HOMES):
• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development. • The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation. • Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas. • This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16266  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):
• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development. • The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation. • Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas. • This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14488  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):
• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16267</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES): • It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14511</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT TO POLICY I1 (INFRASTRUCTURE &amp; DELIVERY) • Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan. • Excessive housebuilding in countryside not supported by any funding or provision for infrastructure. • Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure. • Draft CIL scale discourages use of brownfield land first. • No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly 5 considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16283</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY) • Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan. • Excessive housebuilding in countryside not supported by any funding or provision for infrastructure. • Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure. • Draft CIL scale discourages use of brownfield land first. • No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly 5 considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14512</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY): • Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough. • Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented. • Road plans too optimistic anyway, especially post-Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16284</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY): • Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough. • Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented. • Road plans too optimistic anyway, especially post-Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

 Attached documents:
I OBJECT TO POLICY 13 (SUSTAINABLE TRANSPORT): • Just a list of generic measures, not related to real life or the particularities of Guildford. • Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development. • Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. i.e. most residents! • Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY 13 (SUSTAINABLE TRANSPORT): • Just a list of generic measures, not related to real life or the particularities of Guildford. • Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development. • Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. i.e. most residents! • Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16286</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT TO POLICY I4 (GREEN &amp; BLUE INFRASTRUCTURE): • Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT TO the lack of provision for new schools.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT TO the lack of any immediate provision for Doctors Surgeries.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14483</th>
<th>Respondent: 15603361 / Ann Watkins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT: • No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

I OBJECT to A43 Garlick’s Arch – the site floods and is covered in ancient woodland. The industrial space is not needed and if necessary could be accommodated at Slyfield. With proper use of brownfield sites this Green Belt site is not needed.

I OBJECT to A43a - the on and off ramp at Clandon – this will increase traffic problems in the villages, not help them, and increase the speed and density of the traffic through our villages and past local schools, as well as increase noise and pollution levels which are already at excessive levels.

I OBJECT to A45 the Talbot – this is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16262  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT: • No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

I OBJECT TO POLICY P2 (GREEN BELT): • No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements. • No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions. • Impact of Green Belt development on local agriculture ignored. • Impact on rural leisure and tourism ignored. • Impact on flood control ignored. • Impact on carbon sink and knock-on effects for air pollution and climate change ignored. • Impact on biodiversity ignored. • Impact on natural heritage ignored. • Impact on water catchment ignored. • Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored. • Impact on rural business (e.g. mineral mining, film making) ignored. • Impact on natural landmarks and views ignored. • Harm to public health and wellbeing (physical, psychological) ignored. • Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections. • Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF. • Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size. • Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration. • “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective. • Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields. • Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit. • Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16268  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT): • Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl. • Special treatment of ward represented by current Council Leader and his predecessor. Politically biased. • A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16269  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION): • Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16270  Respondent: 15603361 / Ann Watkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.): • Compensation mechanism too feeble to provide protection. • Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/14484  Respondent:  15603361 / Ann Watkins  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT): • No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning. • No statement of how economic, social and environmental impacts should be balanced. • No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it. • No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/16264  Respondent:  15603361 / Ann Watkins  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY): • Numbers based on growth and demographic data now invalidated by Brexit. • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure. • 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account. • Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units. • High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with
the proposed increase in passenger traffic and car parking is already at capacity.

7. Whilst I live in Elmbridge I consider that this proposal will severely impact Cobham and Stoke
D'Abernon as well. Its inconceivable that Cobham will not suffer substantially increased traffic, to the
railway station in particular which is bound to share some of the load with the designated stations.

8. I also regularly enjoy the tranquil environment of the public footpaths across this local area and
shudder to contemplate the impact of the equivalent of a new town being squeezed onto this site.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the
  site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest
  (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the
  borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will
  exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the
  acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced
  through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1)
  access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish
  to see both the historic features of the village maintained and the village’s green spaces, including the FWA/
  TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) -
  where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd.’s (WPIL)
planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning
Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows),
Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3489  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6785  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14557  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14559  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14544  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/14545 Respondent: 15603489 / Simon Pitt Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14546 Respondent: 15603489 / Simon Pitt Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/14562  **Respondent:** 15603489 / Simon Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14555  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14552  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14553  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/14560  **Respondent:** 15603489 / Simon Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14549  **Respondent:** 15603489 / Simon Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and...
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14543  Respondent: 15603489 / Simon Pitt  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14540  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14541  Respondent: 15603489 / Simon Pitt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing
that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SQLP16/1676  Respondent: 15603489 / Simon Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** SQLP16/1677  **Respondent:** 15603489 / Simon Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** SQLP16/1678  **Respondent:** 15603489 / Simon Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

---

Page 257 of 2988
<table>
<thead>
<tr>
<th>Answer (if comment is on questions 1-7 of the questionnaire): ()</th>
</tr>
</thead>
</table>

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

|-------------|-------------|-------------|----------------------|-------|--------------------------------------------------------------------------------------------|

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.
This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14554  
Respondent: 15603521 / Nicholas Bullman  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is only a vague mention of schools in the Definitions under Policy II Infrastructure and Delivery

- We already have a lack of state primary school places in the village. For example, our daughter was on a waiting list to get into The Raleigh primary school until the very last moment when someone else decided to send their child to Glenesk. We were very close to having to drive our daughter from West Horsley to a different town for a school place, which when both parents have to work would have been a life damaging inconvenience. The new developments would be putting any new families that could actually afford to live there into this awful situation. The Raleigh - which serves children from West and East Horsley - has been full every year for many years.

- Howard of Effingham secondary school places are already limited and other secondary schools mean much longer commutes (in terms of both time and distance) from West Horsley village. We moved here on the basis that our children would be able to attend the local schools, and have made huge sacrifices to do this. We barely managed for our daughter to get accepted into The Raleigh, and can only hope she will make it to Howard. The proposed increase in housing in West Horsley (and East Horsley) simply does not address the already acute shortage of local school places for existing residents/housing.

- Glenesk and Cranmore private schools situation in East and West Horsley are also at or very near full capacity each year. Pupils attending there travel for up to 14miles to attend, adding to a high volume of traffic to and from each school twice a day on Ockham Road North and the A246 respectively. A large increase in other road users in the area will aggravate this situation considerably.

Medical facilities

- Whilst we live in West Horsley, we can’t even use the local Kingston Avenue Medical Centre and have to travel to Send. As far as we understand, Kingston Avenue Medical Centre is already at capacity and can’t even serve existing local residents such as ourselves. Only a possible extension to Kingston Avenue is mentioned, it doesn’t sound sufficient given the existing situation.

- The planned population increase for the Borough (in excess of Government ONS forecasts) will require a major extension of the Royal Surrey Hospital to cope as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Waste Water Infrastructure

- Sewage overflow problems already exist in the Ockham Road North/Green Lane area. Guildford Borough Council has already been advised that the area’s wastewater network is unlikely to be able to support the demand from the proposed developments. The foul drainage system from West Horsley to the treatment works north of Ripley will need to be upgraded to handle this demand. Advice from Thames Water is that they need a 2 to 3 year lead-in period to install necessary wastewater network and treatment capacity after planning permission for a development is granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Roads and Transport Infrastructure

- The rail station car park is normally full on weekdays. If the village population were to increase there will be added pressure on this already full parking scenario, and on traffic movements to/from Horsley station to drop off/collect travellers, commuters and school children.

- Traffic generated from the proposed new development will be significant, given most households in rural areas have 2 and often more cars. Journey times will increase significantly on local roads. The roads, by the way are already in a shocking state in terms of potholes.

- Increased traffic will also pose a safety issue to pedestrians. In some places the pavements are already very narrow and an increase in traffic increases the likelihood of an accident in these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14563  Respondent: 15603521 / Nicholas Bullman  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1 - Presumption in favour of Sustainable Development, Policy S2 - Borough Wide Strategy, Policies H1&H2 - Homes for all & Affordable Homes

- Policy S2 states provision will be made for 13,800 new homes over the Plan Period 2013 - 2033. The number of homes it too high and unsustainable for Guildford’s villages. The Site Allocations list totals 12, 698

- West Horsley village expansion would be unsustainable for the proposed high number of new houses - we already have very limited local services (no post office, one small shop with barely any nearby parking, limited bus services)

- The proposed development of 385 homes on 4 proposed sites are at much higher densities than currently exist in the village - they will be out of character with existing densities and existing mix of housing styles. They won’t fit the village.

- The homes building proposals will not be sustainable in terms of roads capacity, shops, parking, schooling, drainage, parking in East Horsley (station and shops), or public transport.

- No proof has been put forward for why so many homes need to be built in West Horsley over the first 5 years of the pLan period 2018 - 2033. In fact, The West Horsley Parish Council and Surrey Community Action Housing Survey : May 2014 identified a limited need for approximately 20 affordable homes for local people who want to remain in the village (young people and elderly downsizers).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14561  Respondent: 15603521 / Nicholas Bullman  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In reference to: Policy P2 - Green Belt and the Countryside, and Policy P1 - Surrey Hills Area of Outstanding Natural Beauty (AONB)

- The proposed plan is not in-line with continuing to “protect the Metropolitan Green Belt against inappropriate development”
- I am opposed to West Horsley village being removed from the Green Belt by insetting and expanding the 2003 Local Plan Settlement Area boundaries. No justification is given, exceptional circumstance or otherwise, for the New Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt.
- The Green Belt and Countryside Study is flawed
- West Horsley’s current Settlement Area boundaries (ref 2003 Local Plan) do not need extending
- West Horsley receives a significant number of recreational visitors (including cyclists, and walkers) throughout the year. This is due to the current housing density settlements, variety of historic buildings and position on the north side of the North Downs, partly in the Surrey Hills AONB. The proposed plan would negatively affect the enjoyment gained by these visitors.
- The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 does not make any case for locating large numbers of homes in West and East Horsley or neighbouring villages. In fact, the proposed new economic development site proposals are on the opposite side of the Borough to West Horsley!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14569  Respondent: 15603617 / Jennifer Choyce  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident within the Ripley Greenbelt I strongly object to the local plans for removal of the green belt for development. As an ecologist, I object to this based on the effect it will have on local wildlife populations and habitats, with regards to hedgehogs, badgers and rare bat species in the area. Along with the aforementioned points I object for the following reasons:

1- the loss of any Greenbelt area is a sad thing
2- any in-setting of any village from the green belt is unthinkable to those that live here and adore the tranquility of the countryside
3- it creates disproportionate amounts of development across the borough and puts pressure on sounding roads and amenities
4- there was a very limited consultation period for the plan
5- the inclusion of new sites was given with less than two weeks notice
6- where are the numbers that state we need this vast amount of housing in the area
7- where is the evidence for the increased capacity towards schools, hospitals and other local services
8- where are the ecological reports stating that the site is clear for development
9- you want to destroy one of the last untouched spacious areas in Surrey that make it desirable- people won't be here if you build over what attracts them

The whole plan is a travesty and has caused discord across the borough. These villages have stood in scenic land and protect space from the London sprawl for 100's of years, what gives you the right to sign away the land for profit?

Please, read and listen to those of us that will be affected by this. Hasn't this country suffered enough loss already this year. Make the right choice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6788  Respondent: 15603777 / G Field  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.
  7. Our Queen’s speech at the opening of Parliament one month ago our queen said “a promise to ensure transport and buses will not be reduced and this would be for the Mayor to ensure” - proposed local bus services have been proposed locally and now we hear the same for many train services.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPI) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

• I object to all the proposals mentioned above and we feel because of the result of the recent Referendum result it is imperative for the Guildford Borough Council to go “back to the drawing board” to reassess the numbers of properties which would be needed within Surrey together with providing information on infrastructure and additional facilities required. These numbers of properties required will certainly be extremely different to the calculations made before the Referendum!
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3495  
Respondent: 15603809 / Sian Buller  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to voice my objections with regards to the proposed plans as detailed below:

1. I object to the Local Plan with regard to the amount of house building that is planned in East and West Horsley. This will have cause irrevocable damage to the community and character of these two villages and the surrounding area. This extra amount of houses is wholly inappropriate for villages of this size.

1. I also object to the extra traffic these plans will bring into the area. Most of the roads around here are quite narrow and not suitable for a large influx of traffic on a daily basis. The Ockham access to the A3 is already congested in the morning and this will only make matters worse, leading to more accidents and hold ups.

3. I also object to the removal of the protection of the Green Belt, for the areas around The Horsleys, Effingham, Ripley, Clandon and Send. This will see the extension of urban sprawl out from Leatherhead and along the A3. Our British Wildlife is already under increasing pressure from changing farming practices and loss of habitat, especially hedgerows and this kind of development will only continue that decline due to more loss of habitat and bio diversity. Plans for house building should be utilising Brownfield sites such as the one at Burnt Common, rather than carving up our Green Belt. Also, the directive from The Government, clearly states that housing need is not sufficient cause to encroach on the Green Belt.

1. I object to this Guildford Borough Wide Strategy of a proposed 13,860 new houses without any constraints. This is wildly different from many other Borough Councils in Surrey. Also, there appears to be a disproportionate amount of development earmarked for this area, as it represents 36% of the total housing planned for the whole Borough and the area around here is only a small proportion of the whole Borough area.

I certainly hope that common sense will prevail and a consideration of what we will lose as a Borough if this the erosion of the Green Belt is allowed. If this plan goes ahead the generations to come will suffer from the lack of green space and countryside within easy reach of their homes. Once the Green Belt has gone it can not be replaced, it will be gone forever!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3501  
Respondent: 15603905 / Michael Douek  
Agent:

I certainly hope that common sense will prevail and a consideration of what we will lose as a Borough if this the erosion of the Green Belt is allowed. If this plan goes ahead the generations to come will suffer from the lack of green space and countryside within easy reach of their homes. Once the Green Belt has gone it can not be replaced, it will be gone forever!
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3500  Respondent: 15603905 / Michael Douek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6795  Respondent: 15603905 / Michael Douek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6797</th>
<th>Respondent: 15603905 / Michael Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) |
| This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14617</th>
<th>Respondent: 15603905 / Michael Douek</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) |
| Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |
The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14621  Respondent: 15603905 / Michael Douek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence.

This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14618  Respondent: 15603905 / Michael Douek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14612  Respondent: 15603905 / Michael Douek  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
<tr>
<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)</td>
<td></td>
</tr>
<tr>
<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14606  Respondent: 15603905 / Michael Douek  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
<tr>
<td>I object to development in areas at risk of flooding (Policy P4)</td>
<td></td>
</tr>
<tr>
<td>The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14606  Respondent: 15603905 / Michael Douek  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
</tbody>
</table>
The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14614  Respondent: 15603905 / Michael Douek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6798  Respondent: 15604065 / Abigail Harrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals for Blackwell farm development (policy no A26) and the proposal to build a road from the A31 to the Tesco roundabout.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4088  Respondent: 15604129 / Poppy Greener  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As you are intending to destroy the Village for future generations it is incumbent upon me to let you know the feelings of my daughter:

Poppy Greener, aged 10:

“I object because where I am growing up there is loads of green space. If you take Send out of the greenbelt there will be none of these things and we will have to stay in the garden and there is no space to ride our bikes in the garden. I like watching all the wildlife but again if you take Send out of the greenbelt there will be none of these things to watch or do”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- Yet again you are ignoring the clear concerns of local people. Why?
- Tannery lane is not appropriate for the development you seem determined to allow. Why don’t you come and have a look at the narrow nature of the lane (it is a lane) that is wholly unsuitable for the amount of additional traffic that would be generated.
- There is a 33% increase in homes. Why? This ignores the wishes of local people and exacerbates the above problems.
- The permanence of the open River Way countryside will be permanently lost. Quite clearly that is counter to the key tenets of the NPPF. There are no exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3840  Respondent: 15604161 / Simon Greener  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

I feel we are fighting against a route that you are taking that appears entirely fait accompli. Why this is the case is hard to fathom. Once you lose the Greenbelt and impose what it is you are proposing in the countryside you lose forever what makes this area special. Not just for residents but for those who visit and for future generations.

Stop for just a moment to consider the enormity of what it is you are proposing and what value you propose to destroy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We are residents of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], Normandy and currently have difficulty accessing our driveway during the day due to the high volume of traffic in the area and particularly during peak travel times. We believe that the addition of 1,100 new houses in the area will make this situation considerably worse. The plans don’t appear to have addressed the road infrastructure in order to accommodate what could be an additional 2,000 or more cars using the local road system.

We moved into this area in order to enjoy the semi-rural nature of this location and believed that this would be protected by being designated greenbelt. Whilst we accept that new housing is necessary, we feel that 1,100 homes is disproportionate to the size of the village and will significantly change the whole culture of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/514</th>
<th>Respondent:</th>
<th>15604193 / David &amp; Julia Rennie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

My wife and I would like to communicate our support for the removal of site A46 and A47 for 1,150 homes from the local plan. We believe that the local infrastructure and particularly the road system would not be able to support such a development.

When we moved to this area it was largely because of the surrounding open spaces and countryside. We therefore object to the removal from the green belt of homes in Guildford road, the northern end of Glaziers lane, Flexford, Walden Cottages and Palm House Nursaries traveller site as it would lead to much higher density developments and spoil the character of the local area. The gradual erosion of the green belt to developers trying to make a fast buck is something we expect our local politicians to defend us from.

We understand the requirement for some local house development and, speaking as residents who's homes access directly on to Guildford road, we believe that road improvements are already needed. The ridiculous queues caused by the level crossing at Ash station are not acceptable and if more homes are developed it would bring rush hour traffic to a standstill and we would become prisoners in our homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3520</th>
<th>Respondent:</th>
<th>15604289 / Lesley Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3521  Respondent: 15604289 / Lesley Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy.

This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A25 with proposals for Gosden Hill Farm. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford. The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt. The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement. Note the following accident data: 2010-2014 from Crashmap data

- 2010 – 2014 from Crashmap data
  - Clandon Cross Roads Area to Bulls Head - 17 incidents
  - Bulls Heads Head to Bennett Way - 8 incidents
  - Bennett Way to Highcotts Lane - 15 incidents
  - Tythebarn Lane to Portsmouth Road Birch Close - 8 incidents
  - 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  - 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
  - 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
  - 20 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
  - 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below). The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham. No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF. The scale of Gosden Hill is out of proportion to West...
Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond. Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day. Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development. The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London. The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants. The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley. If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km. Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/6812  Respondent:  15604289 / Lesley Pitt  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch. The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car. The site is susceptible to flooding and will not make a suitable site. The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt. I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site. It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development.
However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road.

Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians. The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford. Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2). The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016. Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site. National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3). The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4). This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3). The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4) It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a) The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/14662  Respondent:  15604289 / Lesley Pitt  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14679  Respondent: 15604289 / Lesley Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment
I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14680  Respondent: 15604289 / Lesley Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D4 - Development in urban areas and inset villages
The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14659  Respondent: 15604289 / Lesley Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)
I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, 7 pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3. I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a nonsustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site. The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14660  Respondent: 15604289 / Lesley Pitt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the location for new employment floorspace (Policy E2)
I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14661</th>
<th>Respondent: 15604289 / Lesley Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14698</th>
<th>Respondent: 15604289 / Lesley Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.
The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm. Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:
1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E7 Guildford Town Centre
The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.
The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14673   Respondent: 15604289 / Lesley Pitt   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly. Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40. In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative nondevelopment uses. It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter 11 belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand. In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income. And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box
policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.)

The policy should include the need for a balancing exercise including consideration whether more suitable locations exist. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist. The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.) The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14663  Respondent: 15604289 / Lesley Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11) our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as West Clandon, already suffer from
traffic congestion. Further development around these villages will only result in more traffic and more parking problems. With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number. The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable. Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)
I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan. There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14667  Respondent: 15604289 / Lesley Pitt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)
Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14657  Respondent: 15604289 / Lesley Pitt  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I OBJECT to not protecting the Green Belt (Policy P2)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the 5 borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites. I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this. I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth. In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ’special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14699  Respondent: 15604289 / Lesley Pitt  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.
1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.
3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.
4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as
perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14658  Respondent: 15604289 / Lesley Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding. The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14638  Respondent: 15604289 / Lesley Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline. Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development. The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities. The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14656  Respondent: 15604289 / Lesley Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2. POLICY S2
I OBJECT to the Borough Wide Strategy (Policy S2)
The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey. The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West, but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market. 3 These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced. The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”. The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important. The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN I re not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

4
The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase
availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited. This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another. It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough. The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/1680  **Respondent:** 15604289 / Lesley Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant. The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population.
   Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken
into account. The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1681</th>
<th>Respondent: 15604289 / Lesley Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on. That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land. Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal. As a result I do not see how the 2016 draft Plan can be Legally Compliant. The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1682</th>
<th>Respondent: 15604289 / Lesley Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:
1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits
such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

18. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

19. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

20. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

21. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

22. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
23. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little. 

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** SQLP16/1683  **Respondent:** 15604289 / Lesley Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate. This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough. The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan. Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages. This is not cooperation by any definition. In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/3517  **Respondent:** 15604449 / Annabel Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3515</th>
<th>Respondent: 15604449 / Annabel Curling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection to your Local Plan and specifically to the Gosden Hill proposed development and its effects on the surrounding area.

I was brought up in West Clandon, attended Kindergarten there, went to school in Guildford and had my first jobs in the town. Both my brothers attended school in Ripley. My mother still lives in, and we all still regularly visit, the same house that she and my father purchased 56 years ago in 1960. It was a village without much traffic and the whole area was very green and wooded.

A huge increase in traffic is one of the obvious changes in that time and the Gosden Hill Development would increase the already huge numbers of cars dramatically. In my own street in Sussex, there has been a threefold increase in cars in the past few years and soon to be more with teenagers learning to drive, and the same will happen on any development. The Street in West Clandon is narrow and winding and already busy as a through road. It is not suited to large amounts of traffic. The A3 is a very busy road and even 20 years ago when driving to Clandon from London there were invariably delays, often long. Just a few years ago, we were witness to an accident at Burnt Common roundabout as a car with hit by a lorry, lifting the car off the ground.
With regard to services at Gosden Hill, even now providing enough water to houses presents problems without extra housing developments. Disposal of waste water and sewerage and the provision of electricity and gas will be a strain on overburdened resources. The Grid struggles at times already to provide enough electricity.

The Green Belt, which is being destroyed, was created to provide a green lung around towns so that people could get fresh and healthy air. This is needed more and more as the population increases and more countryside disappears under housing schemes.

I understand that an industrial unit is also intended at the same site – one sees these buildings left empty for years on end and I feel that building another cannot be necessary.

If the Gosden Hill development proceeds, it will damage entire surrounding areas with the knock-on effect of more cars crammed onto already log-jammed roads, the need for but lack of healthy air and green spaces, and the destruction of land for any future agriculture.

I would, therefore, urge you to reconsider your proposals. Set out below are further objections in more detail.

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.
Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.
Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/6807  **Respondent:** 15604449 / Annabel Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.
I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14674  Respondent: 15604449 / Annabel Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14684  Respondent: 15604449 / Annabel Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14685  Respondent: 15604449 / Annabel Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14670  Respondent: 15604449 / Annabel Curling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14671</th>
<th>Respondent: 15604449 / Annabel Curling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14672  Respondent: 15604449 / Annabel Curling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14683  Respondent: 15604449 / Annabel Curling  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14681  **Respondent:** 15604449 / Annabel Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14686 Respondent: 15604449 / Annabel Curling Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to
court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/14676 | Respondent: 15604449 / Annabel Curling | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14668  Respondent: 15604449 / Annabel Curling  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14669  **Respondent:** 15604449 / Annabel Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14665  Respondent: 15604449 / Annabel Curling  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/14666  **Respondent:** 15604449 / Annabel Curling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6809  Respondent: 15604833 / Susan Vaughan Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to voice my very great concern that this proposed development site remains part of the Draft Local Plan on the basis of its potential effect on air quality.

1. On 9th February 2016 the European Lung Foundation produced a paper following a study conducted in Canada on the effect of maternal diesel particulate inhalation during pregnancy resulting in a significantly increased incidence of neonatal and childhood The summary of this paper is attached for information.
2. Guildford Borough Council undertook an air study in 2013 the results of which are also appended.
It revealed that station 5 (Junction 10 M25/A3 - Wisley) had the highest air pollution recorded of all stations tested.

1. Further evidence of this was also produced by:-
   1. Surrey Your Air Millennium Report
   2. Surrey Future Congestion Programme 2014
   3. A3 corridor improvement appendix.

2. Within my former practice as a GP with a special interest in paediatrics, I have hitherto been all too well aware of the hazard to young children in pushchairs of inhaling diesel particulates causing resultant childhood asthma.

3. This latest research suggests a whole new level of threat to the unborn infant based on maternal diesel particulate exposure during.

4. The traffic implications of the additional 2,100 new homes planned for the Wisley Airfield site will inevitably increase air pollution in a place which already has the most significant air pollution in Surrey.

5. In turn this will produce a substantial increase in serious child health consequences.

For this reason alone the site should be removed from the proposed Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6808  Respondent: 15604833 / Susan Vaughan Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. At no stage during the previous draft local Plan process and subsequent consultation was this site proposed for consideration; now suddenly it has been included in the present draft Local Plan increasing the development burden within West Horsley.

2. The site to the south of East Lane adjoining Lollesworth Lane is an important green space to be viewed and enjoyed when traversing East Lane in either direction.

1. This site is unsustainable and unsuitable for the proposed density of development due in part to its green belt status; in part to infrastructure fragility and incapacity (drainage and road surfaces - both already failing due to lack of ongoing expenditure to improve capacity).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14688  Respondent: 15604833 / Susan Vaughan Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Green Belt & Countryside Study is flawed.

1. West Horsley Parish is one of a rich and varied mix of well-established low housing density settlements with a considerable number of historic buildi
2. Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each
3. The Key Evidence document "Guildford Borough Economic Strategy 2013-2031" made no case for locating large numbers of homes in West and East Horsley or neighbouring
4. Proposed new economic development site proposals are on the opposite side of the Borough to West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14689  Respondent: 15604833 / Susan Vaughan Jones  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Village expansion is unsustainable. With only one small shop, no post office, a very limited weekdays only bus service through the village, it is clearly unsustainable for the proposed high volumes of new housing development

1. The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the
2. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station and public transport
3. The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven.

The West Horsley Parish Council and Surrey Community Action Housing Survey conducted in May 2015 identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6810  Respondent: 15604897 / Dionne Hills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A15
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14691</th>
<th>Respondent: 15604961 / Gilbert Davies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I would like to object to the proposed housing plan on the land of Guildford cathedral. Already we have major pedestrian problems as well as obscured views when leaving our driveways. We are living on a semi rural road, which already has its problems, including drainage. I'm also not happy with the cathedral not wanting access from its main entrance whilst they are happy to burden their immediate neighbours with the added traffic and obscured views.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3529</th>
<th>Respondent: 15606561 / Rebecca Warwick</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**I object to the proposed Infrastructure Schedule (Appendix C)**

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**I object to the figure of 693 houses per annum in the borough being too high (Appendix D)**

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)**

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14720  Respondent: 15606561 / Rebecca Warwick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14728  Respondent: 15606561 / Rebecca Warwick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14708  Respondent: 15606561 / Rebecca Warwick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14732  Respondent: 15606561 / Rebecca Warwick  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14712  Respondent: 15606561 / Rebecca Warwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14703  Respondent: 15606561 / Rebecca Warwick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**I object to the proposed Infrastructure Schedule (Appendix C)**

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**I object to the proposed Infrastructure Schedule (Appendix C)**

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6819  Respondent: 15606593 / James Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6815  Respondent: 15606593 / James Green  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)**

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)**

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)**

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14713</th>
<th>Respondent: 15606593 / James Green</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I object to development in areas at risk of flooding (Policy P4)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14702</th>
<th>Respondent: 15606593 / James Green</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I object to the local plan as the development proposed is not sustainable (Policy S1)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14717</th>
<th>Respondent: 15606593 / James Green</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

** Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3527</th>
<th>Respondent: 15606625 / Rebecca Sear-George</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

** Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3524</th>
<th>Respondent: 15606625 / Rebecca Sear-George</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

** Attached documents:

<p>| Comment ID: PSLPS16/6818 | Respondent: 15606625 / Rebecca Sear-George | Agent: |</p>
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6814</th>
<th>Respondent: 15606625 / Rebecca Sear-George</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)</td>
<td>Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14722</th>
<th>Respondent: 15606625 / Rebecca Sear-George</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)</td>
<td>This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14722</th>
<th>Respondent: 15606625 / Rebecca Sear-George</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14706</th>
<th>Respondent: 15606625 / Rebecca Sear-George</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14714</th>
<th>Respondent: 15606625 / Rebecca Sear-George</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**I object to the local plan as the development proposed is not sustainable (Policy S1)**

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3525  Respondent: 15606657 / Kim Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6817  Respondent: 15606657 / Kim Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6813  Respondent: 15606657 / Kim Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14723</th>
<th>Respondent: 15606657 / Kim Hopwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14731</th>
<th>Respondent: 15606657 / Kim Hopwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14715</th>
<th>Respondent: 15606657 / Kim Hopwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14700</th>
<th>Respondent: 15606657 / Kim Hopwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrasctucture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/14719  **Respondent:** 15606657 / Kim Hopwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**I object to the Borough Wide Strategy (Policy S2)**

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/6821  **Respondent:** 15606913 / Kate Johnston  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I support the policy of retaining this land for Allotment use. The half allotment that our family (with Rebecca aged 5 and Daniel aged nearly 3) shares with another family (with Kaitlyn aged 5 and Elena aged 2) provides us with food, exercise, intergenerational company and contact with nature (the children find the bee hives fascinating). Kaitlyn is very much looking forward to working on St Joseph's School plot soon. I find the allotment provides me with a bit of peace away from the family where I can unwind for an hour during schooltimes. One elderly allotment holder holds the same allotment that his father had before him - that soil is special! Our neighbour is aged 85 and we try to help each other with knowledge or muscle.

We have heard that lower vehicular access to Westborough allotments is under threat. My children cannot walk the distance from home to the other entrances. I would have to drive with them, which would add to traffic and defeat the point of getting them out exercising in the fresh air. I also sometimes have to drive onto the plot in order to deliver manure in quantity. The top entrance is not an option as the car would never make it up the hill (if it got down without incident).
The environment of the city would be a lot less green and happy without the allotments. More allotments would be good. I offer my strong support for POLICY A21 (Westborough Allotments) and support POLICY I4 (Green and Blue Infrastructure) in its aim of enhancing biodiversity. "Allotments" needs to be specifically included in the list of green spaces in the definition of "green and blue infrastructure" in para 4.6.31 of the draft plan (page 116).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6822  Respondent: 15606977 / Grant Jux  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
   • I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
   • I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
   • I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
   • I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   1. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   1. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the
countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6830  Respondent: 15607393 / Lucy While  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object, in the strongest terms possible, to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm. I live on High View Road, and chose to live in this location in Guildford in order to be close to natural beauty, which will be destroyed if these plans are agreed.

I believe that if this Plan is agreed, the cost to the environment and ancient woodland will be extremely high, destroying natural habitats. The beautiful scenery and the area’s history will be destroyed. Another major concern is the increase in traffic problems that this will cause. The A3 and A31 are regularly overloaded as it is, with long traffic jams occurring every day. To add the traffic associated with 1,800 houses and an industrial park to this area will be catastrophic, and the increase in pollution will be very damaging to the whole town.

My husband and I chose to move to Guildford because we love it. We love the town centre, and the beautiful green areas surrounding it; for us, Guildford has the perfect balance – particularly the Hogs Back area where we live, which has been designated as an Area of Outstanding Natural Beauty. If this plan is agreed, sadly, we will definitely look to move out of Guildford. We sincerely hope it will not come to this. Please listen to the views of the people who live in Guildford and love the town, and please put the beauty of the town, and the importance of the environment, before profit. I believe that the University has other options they could pursue, instead of encroaching on green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3535  Respondent: 15607425 / Louise Quy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends upon. I am shocked to learn that there is no such schedule for Garlick’s Arch (A43) which indicates to me that the Plan takes no account of the infrastructure that is required for this site. This cannot be tenable and is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3536</th>
<th>Respondent: 15607425 / Louise Quy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan's proposed growth is based on the SHMA report which says that 693 homes per year are required by the borough, which is more than double the figure of 322 used in previous plans.

However, as the council with not publish the SHMA report, this figure cannot be independently verified. This lack of transparency is farcical and disables fair consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6834</th>
<th>Respondent: 15607425 / Louise Quy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Garlick's Arch is protected from development due to its Green Belt status. There are no exceptional circumstances which allow its removal from the Green Belt (Policy P2) - Central Government clearly state that the need for new housing is not an exceptional circumstance.

The Plan clearly states the preference is to use previously developed land, but Guildford Borough Council have removed a brownfield site at Burnt Common, and replaced this with Garlick's Arch.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14798  **Respondent:** 15607425 / Louise Quy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Garlick's Arch (A43) proposal would double the built area in the locality, and I fear this would irrevocably damage the character of Ancient Woodland located here, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14800  **Respondent:** 15607425 / Louise Quy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no discernable need for new industrial sites at Garlick's Arch (A43) because there is already an existing brownfield industrial site located in Burnt Common that could easily accommodate the 7,000sq m proposed - why was this site removed from the Plan with no reason given?

I use the current businesses and strongly object to their livelihoods being put in jeopardy by this Plan. They have been trading for many years, employ local people and are clearly sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14793</th>
<th>Respondent: 15607425 / Louise Quy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Plan does not identify adequate infrastructure improvements that support the huge scale of the proposed development, particularly at Garlick's Arch (A43) - it has no infrastructure projects within the Infrastructure Schedule to support this. Having lived in the area for 17 years, I can vouch for the fact that Local Services, Utilities &amp; Sewerage, Doctors and medical facilities are all at, or very near capacity - a further influx of residents on the scale proposed would place incredible strain on these already-stretched services.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14796</th>
<th>Respondent: 15607425 / Louise Quy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is already too much traffic in our villages - Ripley is a point in case - traffic cutting through Ripley from Junction 10/A3 to get across towards Pyford/Woking via Newark Lane (B367) means tailbacks already stretch back along the Portsmouth Road (B2215) to the roundabout under the Ripley Bypass (A3). There are no plans to improve issues like this. Rural roads in this area are narrow, in poor condition and have no footpaths - with 5000 more homes this means dangerous conditions particularly for cyclists, pedestrians/walkers and children in the area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14801</th>
<th>Respondent: 15607425 / Louise Quy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Given the scale of development planned, the A3 and M25 would have to be improved before any such development is done. Highways England have no plans to even start considering improvements to the A3 until at least 2020. Clearly, no tangible improvements will be possible in the timeframe of this Plan and so developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) simply should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14799</th>
<th>Respondent: 15607425 / Louise Quy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

These huge developments that are being planned particularly here in the NE of the borough will clearly add to the current traffic congestion and further contribute to greater levels of pollution which are bound to have a detrimental effect on local residents and the health of their families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14795</th>
<th>Respondent: 15607425 / Louise Quy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the removal of Ripley, Send and Clandon from the Green Belt, along with the sites of Garlick's Arch (A43) and Wisley Airfield (A35) and the subsequent urban sprawl that threatens them. There are no exceptional circumstances that warrant the removal of these villages and sites - as required by the National Planning Policy.

It is therefore logical for the Plan to develop the existing brownfield site at Burnt Common rather than Garlick's Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Over-development of our area will heavily impact Ripley, Send and Clandon, due to the sheer number of houses proposed - (13,860). Both Garlick's Arch (A43) and the old Wisley Airfield (A35) have no accessible train stations as well as inadequate local bus services. It is therefore inevitable that there will be many more cars used in the area. Additionally, the Plan contains nothing that will improve infrastructure to improve Garlick's Arch. It therefore makes more sense for this development to be sited in urban areas where sustainable transport links are already in place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

#### Comment ID: PSLPP16/14797  **Respondent:** 15607425 / Louise Quy  **Agent:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Guildford Borough Council's proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from the plans of all the other Borough Councils in Surrey.

The Plan shows great imbalance across the borough with too much development in the North-East of the borough (Wisley A35), Ripley/Send (A43) and Clandon (A25) - a staggering 36% of all the Plan's new housing is proposed in this area which currently has only 11% of the existing housing.

I am very concerned that 5,036 new houses proposed between the M25 and Burpham (a distance of about 5 miles in total) will obviously lead to merged urbanisations that will engulf our villages and wipe away our identity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

#### Comment ID: PSLP163539  **Respondent:** 15607553 / Penelope Gillmore  **Agent:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3538   Respondent: 15607553 / Penelope Gillmore   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each
Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The "objectively assessed need" figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/6836  **Respondent:** 15607553 / Penelope Gillmore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

Clandon Cross Roads Area to Bulls Head - 17 incidents
Bulls Heads Head to Bennett Way - 8 incidents
Bennett Way to Highcotts Lane - 15 incidents
Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016

15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.
No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft" edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14820  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will "enhance" heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14821  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14806  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1).

I OBJECT to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the location for new employment floor space (Policy E2).

I OBJECT to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14807  Respondent: 15607553 / Penelope Gillmore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14825  Respondent: 15607553 / Penelope Gillmore  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens...
and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14818  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy "vision" describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14813  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
I OBJECT to Policy H1 – Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support with caution higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14823  **Respondent:** 15607553 / Penelope Gillmore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.
The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14810  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the narrow A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and West Clandon are narrow and wide enough for only one vehicle at a time. In the latter, where we live there are stretches of the main road without any pavements at all which makes it especially dangerous for pedestrians already. Access onto the road from the junior school, the church, vicarage, garden centre, Clandon Park, village hall, British Legion Club, the 2 pubs, nursing home and golf course are poor and potentially dangerous.

In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills.

It was part of the Olympic cycling route which has made it even more popular. With not any proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. I repeat that in the case of West Clandon the street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14811  Respondent: 15607553 / Penelope Gillmore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and accidents are common. Any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14812  Respondent: 15607553 / Penelope Gillmore  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14804  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of "only" 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an "acceptable" percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have...
answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To "inset" two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of "empowering local people to shape their surroundings" and other NPPF provisions.

Paragraph 4.3.17 states that "the general extent of the Green Belt has been retained." I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14805  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14803  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims "to secure development that secures the economic, social and environmental conditions in the area". This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as "sustainable", in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. It is plainly hopelessly cobbled together and misplaced on many levels.

It will ruin many local villages and lose some of our precious Green Belt which is meant to be sacred for very good reasons. Once built upon there will be no going back!

I set out below my objections to specific policies and matters within the Plan.

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered "sound".

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable
because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1684  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1685  Respondent: 15607553 / Penelope Gillmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1686</th>
<th>Respondent: 15607553 / Penelope Gillmore</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

"Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt
site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1687</th>
<th>Respondent: 15607553 / Penelope Gillmore</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan must be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3541  Respondent: 15607681 / Robin Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3540  Respondent: 15607681 / Robin Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

---
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6839  Respondent: 15607681 / Robin Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a).

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14824  Respondent: 15607681 / Robin Hopwood  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14827  Respondent: 15607681 / Robin Hopwood  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14828    Respondent: 15607681 / Robin Hopwood    Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14826  Respondent: 15607681 / Robin Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14816  Respondent: 15607681 / Robin Hopwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14819</th>
<th>Respondent: 15607681 / Robin Hopwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to development in areas at risk of flooding (Policy P4)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14814</th>
<th>Respondent: 15607681 / Robin Hopwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrasctucture. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14822</th>
<th>Respondent: 15607681 / Robin Hopwood</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3542</th>
<th>Respondent:</th>
<th>15607809 / Eveleen Gornlok</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) Unnecessary Secondary School in Normandy:

Both King's College and Ash Manor Secondary Schools are significantly under-subscribed. The existing headmasters are looking to the council to allocate extra funds to improve their existing schools. Not build new ones.

It is highly unlikely that 1100 new homes + existing Normandy homes will produce enough pupils for this new school + the environment effects of additional traffic on the already poor roads.

2) Fairground Pitches:

We already have an encampment for Fairground people, which I believe has at least 200 people living there on the edge of Normandy. This is "our fair share" within Guildford Borough. Plus we already have at least 3-4 Mobile home sites also.

3) Retail Space:

I have been a Normandy resident since 1961. For whatever reason, the existing villagers have let 10 retail business / post offices fail over the years. People just shop at supermarkets / retail parks or online.

4) Traffic Chaos:

Traffic in Normandy is frequently chaotic due to cars diverting from the A31 and A331 when there are incidents. They'll go along the A323 or Westwood Lane (to the A331). Coupled with difficult access to Wyke Primary School (which has doubled in size in the last 5 years), the impact of a 1,500 student is simply unimaginable. This would completely blight the lives of everyone in the village, with Gridlock.

5) Infrastructure - Sewage & Drainage Issues:

The sewage system in Normandy has been problematic since Orchard Close / Orchard Way was developed in 1960. Combined with Culls Road / Christmas Pie area, it is totally inadequate. What on earth would the infrastructure cost of such a basic need for hygiene & sanitation be?
The problem is compounded by a high water-table which over the years has eventually led to a Flood Forum, chaired by our MP, Jonathan Lord being set up. Logically, any increase in housing stock & other buildings will have a catastrophic effect on drainage capacity.

6) Infrastructure - Railway Bridges

The 2 railway bridges (Glaziers Lane & Westwood Lane) have been identified as problematic by Network Rail for over a decade. In particular, the bridge in Westwood Lane is a death-trap with an awkward exit from Beech Lane, and an awkward “road kink” in the design of the bridge which has caught people out with catastrophic effect.

TO SUM UP:

I thoroughly refute the proposal for what I consider to be gross over-development of Normandy, given all its infrastructure inadequacies of roads / bridges / sewage & drainage. Also, it is totally unacceptable to house any further fairground families. The village has more than its fair share. Instead, I propose that we continue at a similar rate of in-filling of about 150 residential properties over the lifetime of the plan (15 years), which must include some badly-needed starter homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6841  Respondent: 15607937 / Joanna Kaminska-Hine  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the strategic site at Wisley airfield as this has recently been denied planning permission due to many of the above reasons, as such why is it to be included again, many of the reasons it was reject are not solvable due to its location and the nature of the site. Or is it the case that the council will allow development here regardless due to the revenue they can generate from council tax?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14838  Respondent: 15607937 / Joanna Kaminska-Hine  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I understand that Guildford borough council needs to provide more social and affordable housing, however I object to the large strategic developments at Wisley airfield, Garlicks arch and Gosden Hill as I fail to see what the requirement for large volumes of affordable and social housing is in the undeveloped areas of the borough where there is no employment, no transport and little services. It would be better to provide more affordable and social housing near developed areas where facilities, and employment opportunities are available and where people looking for affordable homes actually want to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14835  Respondent: 15607937 / Joanna Kaminska-Hine  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the local plan based on the strain this will put on Emergency services, a new hospital, fire station and policing facilities would need to be provided for so many new residents. The local ambulance trust is already struggling to meet its target attendance time which will only be further stretched with the increase in population at risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14839  Respondent: 15607937 / Joanna Kaminska-Hine  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

As a married woman hoping to start a family I am concerned about provision of school and healthcare capacity, as well as increased pollution and so object to the proposed developments on the basis of increased pollution, insufficient school places and insufficient healthcare facilities for existing residents let alone new residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object the the development of the strategic sites at Wisley Airfield, Garlicks arch and Gosden Hill as the the road infrastructure does not have capacity to cope with any medium let alone large developments of the proposed scale.
2. I object to the inclusion of the Wisley airfield site and Garlicks Arch as strategic sites due to the congestion on local roads at all times of day. For instance it is often hard to pull out of my home onto the main road in Ripley due to a continual flow of traffic, adding more residents to the local area will result in a large increase in the number of accidents, especially as the roads are narrow.
3. I object to the Strategic sites as the road network that currently exists is barley maintained by the council, an increase in the traffic and number of HGVs using the roads will result in further deterioration. The road infrastructure is incapable of handling the increase demand during the construction phase without significant investment and will be in an even greater state of disrepair once an extra circa 2000 cars are using them daily. I3
4. I object to the inclusion of Wisley airfield and Garlicks Arch in the local plan due to them being in unsustainable locations regarding public transport. Neither location has a suitable train station located within realistic walking or cycling distance, this means only bus services and cars are feasible.

I object the the inclusion of the large strategic sites as insufficient parking will be provided, the village of Ripley already has problems with residents parking on pavements, there is not enough space to support additional vehicles which would be here. Additionally the parking at local stations is insufficient, a multistory car park would need building at each station to accommodate even one of the smaller proposed strategic sites

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14837  **Respondent:** 15607937 / Joanna Kaminska-Hine  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the proposed strategic sites as I fail to see how these are in any way helpful to the needs of local residents, if you also fail to provide improvements to the transport network, and rail access for the many new commuters who will move to the area there are no benefits to existing residents that you represent. There is a level of assumption being applied by the developer that the employment market is able to absorb the increase in residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/14836  **Respondent:** 15607937 / Joanna Kaminska-Hine  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the proposed strategic sites as I fail to see how these are in any way helpful to the needs of local residents, if you also fail to provide improvements to the transport network, and rail access for the many new commuters who will move to the area there are no benefits to existing residents that you represent. There is a level of assumption being applied by the developer that the employment market is able to absorb the increase in residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14831</th>
<th>Respondent:</th>
<th>15607937 / Joanna Kaminska-Hine</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to inclusion of the strategic sites as I feel these would be detrimental to the environment in an already polluted area due to its proximity to M25 road network.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14832</th>
<th>Respondent:</th>
<th>15607937 / Joanna Kaminska-Hine</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to removing the local villages of Ripley, Send and Clandon from the Greenbelt. This proposal interferes with the purpose of the greenbelt which is to prevent urban sprawl and removing the villages would seem to be encouraging an urban sprawl and directly damaging the integrity of the greenbelt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14832</th>
<th>Respondent:</th>
<th>15607937 / Joanna Kaminska-Hine</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the size of the proposed developments at your strategic sites of Wisley airfield, Garlicks Arch and Gosden Hill because all of these sites are bigger than the villages that are established and they will overshadow them. I understand that some development is required but it should be in proportion to surrounding established villages to complement and improve instead of overdeveloping the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/14833  Respondent: 15607937 / Joanna Kaminska-Hine  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to your allocation of a large portion of housing development within a small geographical area of the borough. Focusing on only producing large sites with the sole purpose of making it easier for the developer should not be the basis for planning permission approval. Consideration should be given to the location of any site greater than one hundred houses as the local transport infrastructure is incapable of absorbing the increased demand

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6842  Respondent: 15608065 / Michael Rodd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the inclusion in the Draft Local Plan (June 2016) of Site Allocation A35 - the former Wisley Airfield - for a new settlement with 2,000 dwellings

We wish to register our objection to the proposal to remove the former Wisley Airfield from the Metropolitan Green Belt in the Guildford Local Plan and make the site available for large scale housing development.

We believe that the new and exceptional circumstances required in law for such a change have not been established. We further believe that there are many opportunities in the Borough for housing development in established urban areas without the need to destroy an essential safeguard to the environment of all of us.

This change to the Local Plan would have a serious, negative impact on local communities including our own in Cobham. As the nearest town of any size to the new development Cobham would become the first port of call for many of the services required by those living in the new homes. Our already overstretched roads and public transport links would come under ever greater and unsustainable pressure. We are in no way geared up for such an increase in population and the demands that would accompany it.
The historic communities close to the site - most notably, but not exclusively, the small village of Ockham - would be engulfed in the new town which includes, in a recently presented proposal, buildings of five stories. The rural character of these communities would be destroyed and the result would be a denser concentration of people here than is found in many of our major cities. This reality alone would be sufficient grounds for the strongest objection to the proposed change.

It has been seriously proposed that the new community on the airfield site will turn significantly to walking and cycling rather than depending on road transport. One only has to look at the volumes of traffic currently using our local road network to realise how unrealistic that suggestion is. Our present roads do not cope with the demands that current traffic levels make of them. How much worse - and how considerably less safe - will the addition of substantial numbers of extra vehicles make? Such a development could well lead to more than 4,000 additional private cars trying to use our roads plus all the commercial vehicles needed to service such a new town.

People today assume they will be able to use their cars. It would, in our opinion, be unrealistic to approve a plan based on a belief that cycling and walking will provide an answer to our infrastructure limitations.

Wisley Airfield is not the right place for large scale housing development. We object strongly to the proposed change in the Guildford Borough Local Plan that would prepare the way for such a development and remove the protection to our Green Belt that has served us well for so long.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a regular visitor to the area, I would like to raise my objections to Guildford Borough Council's Draft Local Plan. My son and his family live in the East Horsley. I visit weekly to look after my grandchildren and therefore also the area’s facilities. I also live in Surrey, on the border between Camberley town and Frimley village. Since moving in over 30 years ago, I have seen first-hand what a dramatic change housing and development can make on an area; transforming from being relatively quiet to becoming a major conurbation.

There are few places in the South of England that are as beautiful and charming as the countryside and villages of the Surrey Hills. Unlike the area around Camberley, I was under the impression that the green belt would protect the welfare of grandchildren, the well-being of the village communities and an area of outstanding natural beauty. The proposed plan seems intent on destroying, rather than protecting the area’s character.

The proposed increase in housing would have a severe negative impact, and seems far too large for such small villages. Changing village and green belt boundaries should not be allowed. Transport and roads will not be able to cope with the step change increase in use, from the moment the construction starts. Roads area already in poor condition, there are limits on how village roads can be developed and there will be no way to ‘bypass’ the traffic away. The infrastructure impacts seem to be underestimated or unplanned for; overfilled schools, medical facilities where it is hard to get an appointment and even drainage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6848  Respondent: 15608225 / Louise Wickham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6847  Respondent: 15608225 / Louise Wickham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)**

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: PSLPP16/14872  Respondent: 15608225 / Louise Wickham  Agent:

**I object to the lack of proper infrastructure planning for sites (Policy I1)**

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: PSLPP16/14874  Respondent: 15608225 / Louise Wickham  Agent:
**I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)**

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/14868  **Respondent:** 15608225 / Louise Wickham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

---

**I object to poor air quality concerns (Policy 13)**

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/14857  **Respondent:** 15608225 / Louise Wickham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

---

**I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3551</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3552</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6851  Respondent: 15608289 / Olivia Marshall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

• Clandon Cross Roads Area to Bulls Head - 17 incidents
• Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

  Surrey Fire and Rescue deployed.

2016
- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6852</th>
<th>Respondent:</th>
<th>15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>I OBJECT to Policy A43 and A43a on Garlick’s Arch.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>The site is susceptible to flooding and will not make a suitable site.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14873  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14881  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14882</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14867</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14869  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14871</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the loss of rural employment (Policy E5)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14884</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to Policy E6 - The leisure and visitor experience.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Page 411 of 2988
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14880  Respondent: 15608289 / Olivia Marshall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14878</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/14879</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford’s relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14883  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14875  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14876  Respondent: 15608289 / Olivia Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14877  Respondent: 15608289 / Olivia Marshall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14864  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from...
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14858 Respondent: 15608289 / Olivia Marshall Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/14861  **Respondent:** 15608289 / Olivia Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1688</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1689</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>As a result I do not see how the 2016 draft Plan can be Legally Compliant.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1690</th>
<th>Respondent: 15608289 / Olivia Marshall</th>
<th>Agent:</th>
</tr>
</thead>
</table>
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send, and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1691  Respondent: 15608289 / Olivia Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6849</th>
<th>Respondent:</th>
<th>15608385 / Sophie Troughton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the proposal to develop site A26. This seems to be an extensive development planned for an entirely inappropriate place (next to AONB). Such a location should only be considered as a last resort, not as a large, new centre.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>It seems unbelievable that the site could be managed without causing significant additional congestion to current roads, as a site “on the edge” of Guildford would obviously create more traffic to the centre. Extra infrastructure through this area would damage the environment further.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Encroaching on the AONB and AGLV is not a good plan for the future.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3553</th>
<th>Respondent:</th>
<th>15608417 / Denise Horsey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the proposal to develop site A26. This seems to be an extensive development planned for an entirely inappropriate place (next to AONB). Such a location should only be considered as a last resort, not as a large, new centre.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>It seems unbelievable that the site could be managed without causing significant additional congestion to current roads, as a site “on the edge” of Guildford would obviously create more traffic to the centre. Extra infrastructure through this area would damage the environment further.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Encroaching on the AONB and AGLV is not a good plan for the future.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I am horrified at the plans for building in the Horsleys where we have lived for many years. We chose to live here as they are villages, not towns. The Conservatives at the last election promised to keep Horsley in the green belt and protect it. How can we ever trust politicians who renege on their promises? The number of houses that your draft plan says is needed is based on growth that is now not valid as we have left the European Union.

The local roads are now full of traffic and will be unable to cope with lots more cars. The schools and doctors are full. Junction 10 on the M25 is very often blocked - it will be unable to handle significantly more traffic.

We want to continue to live in a village where we can have lots of open spaces to walk with children and dogs. We do not want the spaces filled with lots of rabbit hutch houses with postage stamp gardens. Houses like that are still going to be unaffordable for youngsters.

Why doesn't the government develop less advantaged regions of the UK?

I object to all policies involving building in the green belt. Why were the clearly expressed views of residents in previous consultations ignored?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3556  Respondent: 15608545 / Madeleine Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3557  Respondent: 15608545 / Madeleine Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough, since this figure is too high and not supportable (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. This is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6857  Respondent: 15608545 / Madeleine Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip road to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.
Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which raise health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6858  Respondent: 15608545 / Madeleine Ringshaw  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is for making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced by a Greenfield site? There is no evidence that Section 18 of the
Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light to local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, and these will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/6859  **Respondent:** 15608545 / Madeleine Ringshaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The proposed addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc.) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/14894  **Respondent:** 15608545 / Madeleine Ringshaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/14891  **Respondent:** 15608545 / Madeleine Ringshaw  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14892</th>
<th>Respondent:</th>
<th>15608545 / Madeleine Ringshaw</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14893</th>
<th>Respondent:</th>
<th>15608545 / Madeleine Ringshaw</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14902</th>
<th>Respondent:</th>
<th>15608545 / Madeleine Ringshaw</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14900  Respondent: 15608545 / Madeleine Ringshaw  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy. It is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14895  Respondent: 15608545 / Madeleine Ringshaw  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon, The Street only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements. I have personally witnessed HGVs mounting the pavements on many occasions because they are unable to pass oncoming traffic any other way on this narrow road. Only last week one HGV only narrowly missed one of our neighbours who was walking with her children on the way to school.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPP16/14897  Respondent: 15608545 / Madeleine Ringshaw  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Paragraph 4.6.27 of the Plan states: “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPP16/14889  Respondent: 15608545 / Madeleine Ringshaw  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt). This yet another example of an ill thought out plan and approach. Once taken the Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl with these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost - to the serious detriment of residents and visitors to the area - and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site. Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14890  Respondent: 15608545 / Madeleine Ringshaw  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. This is nonsensical. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14886  Respondent: 15608545 / Madeleine Ringshaw  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact to existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles putting even greater pressure on the road infrastructure. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14887  Respondent: 15608545 / Madeleine Ringshaw  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. Given the result of the EU Referendum this now needs to be reconsidered.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in
the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result will be a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the proposals to remove West Horsley village from the Green Belt by insetting and adding up to 385 homes to four Development sites in the village as laid out in The Guildford Plan.

The proposals as set out in The Guildford plan fail to provide adequate justification or exceptional circumstances for the proposed insetting of West Horsley and will only serve to have a significant detrimental effect on the village and its environment. Also, the proposed addition of 385 homes is completely inappropriate for the size of the village and would not be sustainable for the following reasons:

• The burden on local infrastructure would be unsupportable. Many roads and lanes are narrow and already congested with traffic at peak times queuing to pass through the village. Even the limited public transport service struggles to pass through the village uninterrupted which causes congestion and delays.
• The small village shop will be closing soon which will result in West Horsley village residents having to travel to East Horsley more frequently to shop. Parking facilities near and around the main parade of shops at Station Parade, East Horsley are already often full during most times of the day.
• It is difficult to make appointments at the Medical Centre in Kingston Avenue if you need to seek medical advice less than two weeks in advance. The planned population increase would impact on the Centre’s capacity to cope with resident’s needs. Parking at the Medical Centre is also currently under significant pressure, the car park is frequently full making access to it very difficult and frustrating.
• Several roads throughout the village frequently flood after severe bouts of wet weather and drainage is a constant problem. I am concerned that the construction of nearly 400 additional properties would only serve to make the situation much worse and negatively impact the local infrastructure and environment.
• Other facilities in the village (e.g. the village hall, local churches and halls) are well used but parking at these sites is either non-existent or inadequate for the number of cars that need to be parked. The consequences of this is already causing problems because cars are being parked in lanes nearby (especially Silkmore Lane, where I live) or in The Street which results in through-traffic being unable to pass through the village on both sides of the road.

Planning Practice Guidance as outlined in the National Planning Policy framework states that once Green Belts have been defined, local authorities should plan positively to enhance its beneficial use (p 81) and that new boundaries should only be established under exceptional circumstances (p83). It also states that local planning authorities should take into account the need to promote sustainable patterns of development (p84). I believe The Guildford Plan is categorically not achieving this and entirely fails to make a justifiable case for locating such large number of homes in West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to strongly object to the proposed submission of the Guildford Local Plan (2017) in relation to housing development sites in West Horsley village. Although two sites have been removed (A36 and A41) from the previous local plan, the proposal of four sites (A37, A38, A39 and A40 adding up to approximately 395 new homes) is still completely inappropriate for the size of the village and would not be sustainable for the following reasons:

- The burden on local infrastructure would be unsupportable. Many roads and lanes are narrow and already congested with traffic at peak times queuing to pass through the village. Even the limited public transport service struggles to pass through the village uninterrupted which causes congestion and delays.
- The only shop in West Horsley, which is a specialist cheese shop, does not provide a wide enough range of goods for peoples’ basic needs. Village residents have to travel to East Horsley to shop. Parking facilities near and around the main parade of shops at Station Parade, East Horsley are already often full during most times of the day. The addition of nearly 400 extra dwellings (which would be at the very least an extra 800 people and possibly that many cars) would create unsustainable pressures on the local infrastructure.
- The planned population increase would severely negatively impact on the Medical Centre’s capacity to cope with resident’s needs. Parking at Horsley Medical Centre is currently under significant pressure as it is, the car park is frequently full making access to it very difficult and frustrating.
- Several roads throughout West Horsley village frequently flood after severe bouts of wet weather and drainage is a constant problem. I am extremely concerned that the construction of nearly 400 additional properties would only serve to make the situation much worse and negatively impact the local infrastructure and environment.
- Other facilities in the village (e.g. the village hall, local churches and halls) are well used but parking at these sites is either non-existent or inadequate for the number of cars that need to be parked. The consequences of this is already regularly causing problems because cars are being parked in lanes nearby (especially Silkmore Lane, where I live) or in The Street which results in through-traffic being unable to pass through the village on both sides of the road.

In addition to this, I wish to register my objection to the proposal to extend the village boundary into green belt land behind the houses on the west side of Silkmore Lane. This opens up the extremely unwelcome possibility of development rights on rural land which I strongly feel will be detrimental to the character of West Horsley village.

I believe The Guildford Plan (2017) entirely fails to make a justifiable case for locating such large number of homes in West Horsley. I feel it also categorically contravenes the requirement by law to ‘promote sustainable development through the balancing of social, environmental and economic considerations to achieve the best overall outcome’. The proposals of adding so many extra dwellings in West Horsley village is not sustainable and does not balance social and environmental considerations at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3561  Respondent: 15608801 / Beth Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6864  Respondent: 15608801 / Beth Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14914  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14911  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14912  Respondent: 15608801 / Beth Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14913  Respondent: 15608801 / Beth Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14920  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14918  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14919  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14915  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14916  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14917  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

Comment ID: PSLPP16/14909  Respondent: 15608801 / Beth Fuller  Agent:

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

Comment ID: PSLPP16/14910  Respondent: 15608801 / Beth Fuller  Agent:

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14907  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14906  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

My main objection is one of principle to the proposed building over of valuable greenbelt land, especially when it consists of farmland or woodland. Once built upon it can never be replaced. Future generations will not thank us for facilitating the spread of urban sprawl. And I also object to landowners converting such farmland/woodland to uses such as golf courses (having been refused planning permission for housing) in the hope that they will subsequently, eventually, get such permission - I am thinking of the example of Clandon Golf course outside Merrow, which has never built a club house or made any great efforts to be a profitable golf course.

Secondly, as a long term resident of West Clandon, I am worried about the effects this plan will have upon traffic volumes through our village both from the point of view of road safety on the A247 (a well documented problem) and with a view to air quality concerns. The A247 is already very busy and too narrow for some of the vehicles using it.

Thirdly, as a resident of Guildford, I object to a Local Plan based upon a housing requirement derived from assumptions which have not been clearly explained via a process that is not clear. I suspect that the housing number is overstated and that we really need more smaller homes in existing town centres (i.e near shops/transport links/local jobs), rather than the larger more profitable homes the builders would prefer to build on greenfield sites.

Lastly, I object to having to repeatedly object to much the same Local Plan as last time around despite the numerous objections made then.

I set out below my objection to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14908  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4465  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land
12. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.
19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4466  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl! Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp17q/556  Respondent: 15608801 / Beth Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14934  Respondent: 15609025 / Anne Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I would like it to be known that I object to Chilworth being removed from the Green Belt in your plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the evidence - GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that industrial space at Burnt Common is no longer needed. as numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable. The number of foreign students has been wrongly used to inflate the need. The required number of 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, 8,000 new home homes are actually needed (based on 2.5 persons per home). The Green Belt does not need to be built over. 50% of the new homes could be built on brownfield sites. GBC's Transport Assessment was not even available to councillors for the vote taken on May 24th, havinf been published on 6th June. The overload to the infrastructure has been given scant consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the building of 45 houses at Clockbarn Nursery because of inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take any more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been granted for 64 appartments at the Tannery and for building the Marina, both of which will generate additional heavy traffic. The lane simply cannot take any more. The junction is already too dangerous and will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6870</th>
<th>Respondent:</th>
<th>15609057 / Julian Long</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Policy A43 - 30ha land at Garlick's Arch, Burnt Common designated for 400 houses and 7,000m2 of industrial and warehousing. There is no need for any more houses on top of the 13,860 already proposed for the Borough. This site is new and was not included in the Regulation 18 draft and has not been consulted on previously. It is Green Belt permanently protected by the NPPF which prevents further merging of settlements. There are no exceptional circumstances. The site has a particular conservation sensitivity since it is covered with ancient woodland. Trees which existed in the 16th Century would be gravely endangered. The proposed industrial development of 7,000m2 is simply not required since the last ELNA in 2015 shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000m2 of industrial space it should be at Slyfield. A new four-way interchange onto the A3 at Burnt Common would be disastrous for Send. The traffic in Send Road (A247) would be gridlocked all day. Send would become the through route to Woking for traffic leaving the M25 and A3, the proposed 2,000 houses at Wisley and the 2,000 houses at Burpham. The village of Send simply could not take this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6871</th>
<th>Respondent:</th>
<th>15609057 / Julian Long</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Policy A44 - 1.9ha land west of Winds Ridge and Send Hill designated for 40 homes and 2 Travellers pitches. This site is new and was not included in the regulation 18 draft and has not been consulted on previously. Development for housing is inappropriate due to its permanent Green Belt status and high quality Green Belt amenity within an area of beautiful countryside which would be spoilt by any development. The subsoil of the existing site contains documented unsafe landfill waste which is currently vented. The proposal to include 2 Travellers pitches is inappropriate due to the narrow width single track country road providing insufficient access to the site.

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14946  Respondent: 15609057 / Julian Long  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 - Send should not be removed from the Green Belt. Send provides a buffer between Woking and Guildford. The particularly vulnerable areas of land being taken out of the Green Belt include (i) the land behind the school, including playing fields and woodland; (ii) the land to the right of Cartbridge by the Wey Navigation up to the new boundary fence with Vision Engineering; (iii) land to the left of Cartbridge going up to the old depot on the Wey navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14944  Respondent: 15609057 / Julian Long  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council having not followed the correct process. Since 2014 GBC has changed every major site in Send proposed for development, and have now added a massive major new road junction. The 2014 proposal for 430 houses went down in April 2016 to 185, and has now gone up again to 485. These significant changes require another full consultation under regulation 18, not the short cut of regulation 19 which GBC are trying to get away with. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3567  Respondent: 15609089 / Catherine Pelling  Agent:
Object to Send Village being removed from the Green Belt. The green belt was always intended to be forever as required by the National planning Policy Framework, and there are no special circumstances to justify the green belt being lost in part. The green belt in Send creates a divide between Woking and Guildford and should this be built on this divide will be lost forever. The protection of the green belt was promised by both local councillors and central government and development and development of Clockbarn Nursery, Garlicks Arch, Send Hill, A3 Burnt Common interchange would breach this promise.

I object to the construction of 45 new houses of Clockbarn Nursery because of very poor access and the increased traffic volume. Tannery Lane is not fit for purpose to take additional traffic, especially with previous planning being given for 64 apartments and the Marina at the Tannery. The lane will not be able to take any more than this plus the junction onto Send Road is already hazardous and extra traffic on this junction will make matters much worse.

I object to the building of 400 houses and 7000sq metres of industrial spaces at Garlicks Arch, opposite to Send Marsh Road. The site is liable to flooding and is covered in ancient woodland. The industrial space is not required in Send, any further industrial space should be sited at Slyfield in Guildford. Proper use of brownfield sites would eliminate the need to develop on Green belt sites.

I object to development of 40 houses and 2 travelers pitches at Send Hill. The single access narrow country road in not appropriate for access. The subsoil at the proposed site contains unsafe landfill waste which has been registered at GBC. Any development would spoil the beautiful countryside at this site.

I object to a new interchange with the A3 at Burnt common because Send would have to take traffic from the proposed 2000 new homes at Wisley Airfield and 2000 homes at Gosden Hill in Burpham and 1850 at Blackwell Farm. The increased traffic would cause the already strained Send Road to become gridlocked and noise and pollution levels would become intolerable. This can not happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Object to Send Village being removed from the Green Belt. The green belt was always intended to be forever as required by the National planning Policy Framework, and there are no special circumstances to justify the green belt being lost in part. The green belt in Send creates a divide between Woking and Guildford and should this be built on this divide will be lost forever. The protection of the green belt was promised by both local councillors and central government and development and development of Clockbarn Nursery, Garlicks Arch, Send Hill, A3 Burnt Common interchange would breach this promise.

I object to the construction of 45 new houses of Clockbarn Nursery because of very poor access and the increased traffic volume. Tannery Lane is not fit for purpose to take additional traffic, especially with previous planning being given for 64 apartments and the Marina at the Tannery. The lane will not be able to take any more than this plus the junction onto Send Road is already hazardous and extra traffic on this junction will make matters much worse.

I object to the building of 400 houses and 7000sq metres of industrial spaces at Garlicks Arch, opposite to Send Marsh Road. The site is liable to flooding and is covered in ancient woodland. The industrial space is not required in Send, any further industrial space should be sited at Slyfield in Guildford. Proper use of brownfield sites would eliminate the need to develop on Green belt sites.

I object to development of 40 houses and 2 travelers pitches at Send Hill. The single access narrow country road in not appropriate for access. The subsoil at the proposed site contains unsafe landfill waste which has been registered at GBC. Any development would spoil the beautiful countryside at this site.

I object to a new interchange with the A3 at Burnt common because Send would have to take traffic from the proposed 2000 new homes at Wisley Airfield and 2000 homes at Gosden Hill in Burpham and 1850 at Blackwell Farm. The increased traffic would cause the already strained Send Road to become gridlocked and noise and pollution levels would become intolerable. This can not happen.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/6873  **Respondent:** 15609153 / Alex Laxton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Please accept this as an OBJECTION to policies A43 and A43a of the Proposed Submission Guildford Local Plan. I will elaborate on the detail of the objections below, but I wish to state that I was extremely disappointed by the sudden and inexplicable removal of the Burnt Common Nursery site to the southeast of the Garlick’s Arch site; especially since this site had been included in previous drafts of the Local Plan and I understand that Guildford Borough Council had also highlighted it as key to meeting the industrial needs of the Borough:

1. Burnt Common Nurseries has previously been developed and as such constitutes ‘brown field’ development with no loss of valuable agricultural land.
2. The site is effectively screened from the A3, the B2215 (London Road) and from the A247 (Clandon Road). These three roads also form definitive boundaries to the site to prevent further ‘development creep’.
3. The site already includes c.50,000 ft² of industrial units. The landowner/potential developer has produced a scheme to bring further employment to the area through a sympathetic, landscaped industrial development. This is readily deliverable.

4. The same landowner has proposed a scheme of c.100 houses adjacent to the village but screened from existing properties. The access is good, the scheme is readily deliverable, the scale of the development is sustainable for the local village and, to the best of my knowledge, the local population are broadly supportive of this proposal.

Instead of including this readily deliverable mixed employment/residential scheme, Policy A43 is proposed instead:

1. With no apparent consultation, the village of Send Marsh is now confronted by a scheme to add c.400 houses and 75,000 ft² of industrial space on green belt land with no overriding justification.

2. The 30 ha site is not screened in any way from the A3 (which would cause significant traffic noise and disruption to future inhabitants), the B2215 Portsmouth Road or from the houses in Burnt Common Lane.

3. The site currently constitutes agricultural land (and not a paddock as suggested), plus woodland which is believed to date to the C.16th. No justification has been provided for the development of this area or for the loss of important habitats and mature trees; but these significant issues do call into question the overall deliverability of the scheme.

4. The site is in Flood Zone 3. No detail has been provided as to how this is to be addressed in order to permit development; but this, again, suggests that the site is not readily deliverable.

5. Regarding residential development and the risk of electro-magnetic radiation, the site is traversed by high voltage power lines and pylons forming part of the National Grid.

6. 400 houses are likely to add over 1,000 people to the local community. There is no mention of how this many families will be accommodated by the existing schools, shops, doctors, dentists and other infrastructure. Furthermore, public transport is limited, so it can safely be assumed that the majority of these houses will have one or two cars each with associated parking and congestion issues; especially at peak times.

7. It is not clear how 400 houses can be situated on this site, plus the development of some 75,000 ft² industrial space; how the two can be separated and how safe access for both users can be provided.

8. There is no mention within the Draft Local Plan that Policies A43 and A43a are apparently connected due to the owners of Garlick’s Arch gifting the land for the slip roads on condition of receiving planning permission for housing. This, in itself, calls into question the motivation for inexplicably dropping the Burnt Common Nursery site and including a significantly less deliverable and sustainable alternative.

9. Due to the costs of the construction for the on/off slip roads detailed in Policy A43a, it is questionable whether they will ever be constructed. In the event of the Borough Council/Highways Agency having both the funds and the motivation to build the slip roads in the future, the land could be acquired at that time by commercial agreement or CPO as required. There is no need for the Borough Council to involve itself in a dubious linked-transaction that could give rise to questions about collusion.

To conclude, a mixed use redevelopment at the site of the former Burnt Common Nurseries is supported.

Policy A43 and its conjoined policy A43a is opposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3570  Respondent: 15609185 / Sophocles Alexiou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have been a resident of Send for 20 years. I am incensed at these plans. You have no idea, or do not care about the impact on the villages that these plans will have. Ill-conceived plans - you are destroying peoples way of life and reducing the buffer zone between Woking and Guildford. I am outraged by this. It is irreversible what you are planning on doing, do you not understand what you are doing? Do not hide behind the ‘we need extra housing’ excuse to cover up on your failure to fulfil the Green Belt promise. This is about money and contracts! Last year we had the destruction of woodland off Send Road to build a factory and now this.

1. I object to Send being removed from the Green Belt. The Green Belt was established as a permanent feature required by the National Planning Policy Framework and not something that can be taken away under pressure from property developers, unjustified government targets or a Borough Council who prefers to develop in the areas that they believe will give them the least resistance.

There are no special circumstances to justify Send losing its Green Belt status and as a buffer to separate Guildford from Woking it is essential that its Green Belt status be retained.

Local councillors and central government gave a clear election promise to protect the Green Belt. The current proposals renege on those promises.

1. I object to building 45 houses at Clockbarn Nursery. This is a ridiculous idea. Tannery lane is a narrow and bendy road joining Send Road at a very difficult and potentially dangerous junction. The traffic in Send is already heavily congested and further traffic emerging from Tannery Lane will only make this worse. Traffic improvements at the junction will not help, as the congestion is the result of bottlenecks at both the Burnt Common and Old Woking roundabouts. The future traffic has already been exacerbated by planning permission for 64 apartments and a marina further down Tannery Lane.

1. I object to building 400 houses and 7000m² of industrial space at Garlick’s Arch. Ancient woodland! Subject to flooding! Plenty of brownfield sites already available in the borough! Slyfield is already the industrial centre of Guildford Borough so why create another one especially as there is an over supply of industrial space in the area at the moment and for the foreseeable future. In addition, Guildford’s housing plan requirements have been shown to be grossly exaggerated and when challenged, the council refuses to release their calculations.

1. I object to the development of 40 houses and 2 travellers’ pitches at Send Hill. Another ridiculous idea. As with the Clockbarn proposal, the affect of the additional traffic on the already congested Send Road will be significant and unacceptable. Send Hill is also a narrow residential lane and will be badly affected by the additional traffic.

1. I object to a new interchange with the A3 at Burnt Common. I have already described how Send Road is heavily congested especially at peak times. By creating a new interchange at Burnt Common this will choke Send Road and the Village with additional traffic to and from Woking. Not only will this become the new rat run into Woking from the A3 and the M25 but will also have to contend with additional traffic from the proposed 2000 houses at Wisley, 2000 houses at Gosden Hill and 1850 houses at Blackwell farm. This on a road that is already heavily congested.

I urge you to reconsider before inflicting irreversible damage to our communities - because that is exactly what you will be doing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7649  Respondent: 15609185 / Sophocles Alexiou  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42
I object to building 45 houses at Clockbarn Nursery. This is a ridiculous idea. Tannery lane is a narrow and bendy road joining Send Road at a very difficult and potentially dangerous junction. The traffic in Send is already heavily congested and further traffic emerging from Tannery Lane will only make this worse. Traffic improvements at the junction will not help, as the congestion is the result of bottlenecks at both the Burnt Common and Old Woking roundabouts. The future traffic has already been exacerbated by planning permission for 64 apartments and a marina further down Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7650  Respondent: 15609185 / Sophocles Alexiou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I object to building 400 houses and 7000m2 of industrial space at Garlick’s Arch. Ancient woodland! Subject to flooding! Plenty of brownfield sites already available in the borough! Slyfield is already the industrial centre of Guildford Borough so why create another one especially as there is an over supply of industrial space in the area at the moment and for the foreseeable future. In addition, Guildford’s housing plan requirements have been shown to be grossly exaggerated and when challenged, the council refuses to release their calculations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7652  Respondent: 15609185 / Sophocles Alexiou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
**I object to a new interchange with the A3 at Burnt Common.** I have already described how Send Road is heavily congested especially at peak times. By creating a new interchange at Burnt Common this will choke Send Road and the Village with additional traffic to and from Woking. Not only will this become the new rat run into Woking from the A3 and the M25 but will also have to contend with additional traffic from the proposed 2000 houses at Wisley, 2000 houses at Gosden Hill and 1850 houses at Blackwell farm. This on a road that is already heavily congested.

I urge you to reconsider before inflicting irreversible damage to our communities - because that is exactly what you will be doing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7651</th>
<th>Respondent: 15609185 / Sophocles Alexiou</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to the development of 40 houses and 2 travellers' pitches at Send Hill.** Another ridiculous idea. As with the Clockbarn proposal, the affect of the additional traffic on the already congested Send Road will be significant and unacceptable. Send Hill is also a narrow residential lane and will be badly affected by the additional traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3571</th>
<th>Respondent: 15609249 / Melanie Leigh</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write as required ahead of 18 July 2016 to object to the Draft Local Plan currently available for comment.

I have lived most of my life in Send Marsh. I visit regularly from my principal London working week residence.

Please confirm receipt of this letter and take regard of my submissions as follows:

- I object to removal of Send Village from the Green Belt
- I object to removal of Ripley and Send Marsh from the Green Belt

---

473 of 2988
I object to removal of Ripley from the Green Belt

The previous draft local plan was withdrawn after generating widespread local opposition. Mole Valley MP Sir Paul Beresford observed:

“This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough”.

Sir Paul’s commentary applies to the revised plan.

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft Local Plan.

Infrastructure in Send, Ripley and Send Marsh and Clandon being already overloaded such that the smallest disruptions cause gridlock over much of our essentially rural roads network please also note that:

I object to an expanded A3 interchange at Burnt Common,

I object to housing and business development proposed for land described as Garlick’s Arch,

I object to housing development at Clockbarn Nursery,

I object to housing development at Send Hill,

all of these sites being unsuitable and in the Green Belt.

The rural character of these villages will be destroyed if these plans proceed as proposed.

I look forward to hearing from you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/14973</th>
<th>Respondent:</th>
<th>15609345 / Paul Thomas</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am objecting most forcefully to destroying the Green Belt as outlined in the Guildford Local Plan (June 2016). This contravenes the whole purpose of it and makes no sense at all.

The removal from the Green Belt of parts of Ripley, Send, Clandon and Garlic Arch would be detrimental to the health and welfare of the residents.
With the development of Wisley Airfield the impact on the local road system would overload the capacity and cause gridlock.

Has the impact of these developments considered the need of schools, hospitals and other amenities.

Once the Green Belt has been concreted over it will never be replaced.

I can not agree with any of the proposed developments

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am emailing to object to the GBC plan as it is currently framed because I do not believe the strategy and sites as a whole to be sound. As a local resident, I am particularly concerned about the plan to build 2,000 houses on the Gosden Hill Farm site. This development impacts on all policies (except for numbers 5, 9 and 11) detailed in the Evidence Base. Although Guildford needs more schools and housing, it first urgently needs an effective approach to traffic management through the town and the A3. The Plan fails in its Duty to provide a sound solution to the traffic problems that will follow from another 2,000 houses and associated cars in the Clandon/Burpham area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

According to the most recent ONS Neighbourhood Statistics, Burpham contains 2,425 dwellings. The proposed development on Gosden Hill represents an enormous increase of 82.5% in the number of dwellings which will inevitably have an impact on a wide environment. It is the duty of GBC to manage that impact effectively and appropriately. Quite apart from the destruction of green-belt land and village character of the neighbourhood, and, notwithstanding the massively increased pressure on provision of adequate water, sewage and power services, the impact on road transport will be unbearable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the proposed boundary change to move the settlement boundary westwards from the houses on the west side of Kingston Avenue to the tree line running along the parish boundary on the west edge of Kingston Meadows which would result in taking all of Kingston Meadows out of the green belt.

I have lived in Old Rectory Lane East Horsley for nearly 38 years, my property edges onto the Kingston Meadows we have the right to a gate opening (and pay annually for this) onto this wonderful open community space which is so well loved and used by Horsley residents and friends.

The circle of trees that was planted by the council when the decision was made to keep this land as open space, still shows the intention for this use.

the playground, exercise equipment, tennis courts, BMX track, all contribute to that feel.

Dog walkers and local exercise classes all make good use of this space.

In the spring the meadows are full of wildflowers, the occasional deer and no doubt, plenty of wildlife "out of hours" our children used to run free, and now the next generation comes to visit, open the gate to run off with a football.

The meadows also get extremely wet, almost flooded, I would worry what would happen to my property if there was any change to the existing use.

even with a small ditch outside our garden, we still get water standing within our property.

No sound reasons have been given for the proposed extension of the boundary, which seems to be aimed solely at increasing the land available within the settlements for future additional development. Moving the green belt boundary westwards does not constitute an 'exceptional circumstance' under the NPPF rules and as such I believe this to be an invalid proposal.

Therefore I OBJECT TO THIS PROPOSED BOUNDARY CHANGE

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
facilities.

? The local primary school (The Raleigh) is oversubscribed - even children living in the Horsleys cannot all obtain a place. This school and the two independent schools create high volumes of traffic approaching and through the village. The Howard of Effingham School secondary school is also oversubscribed. The proposed development of over 500 additional homes in East and West Horsley will result in hundreds of additional school-aged children in need of a school place. This is unachievable.

? There are only two roads through the Horsleys, they are both narrow and unlit and both are crossed by low narrow railway bridges. Most residents would have to commute to work via A3 or A246 or drive through East and/or West Horsley to get to the station or school. An increase in population will cause serious transport problems which would be challenging to overcome given the limited routes through the villages and their narrow width.

3

? The proposed development is disproportionate increasing the village by some 35% and by building at a higher density that is characteristic of the village. Development of the proposed sites is unnecessary and illogical.

? Fields and gardens alongside Ockham Road North flood regularly and the water table is high for the majority of the year. If site A40 is developed this will exacerbate the impact on neighbouring areas. Flood mapping in the consultation document recognizes this problem but the site remains as one for potential development. I am puzzled how houses can be sold in good faith with this risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14986  Respondent: 15609473 / Ed Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The consultation does not deal adequately with infrastructure demands. Roads (especially the A3) in and around Guildford are increasingly congested as are commuter trains. Parking in Guildford and at stations is increasingly difficult and expensive. Parking at The Royal Surrey Hospital is now at the stage where outpatients need to allow 20 minutes just to find a space. This reflects the excellence of the services the hospital provides and it will need to be extended to serve the residents of 14,000 new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/14984  Respondent: 15609473 / Ed Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In the plan 65% of the new houses proposed are to be built on Green Belt in some locations, the proportion is much higher. This cannot be allowed to happen.

The purpose of the Green Belt is to confine development to designated areas and to specifically protect other areas. Government policy is to preserve and protect the Green Belt and the London Mayor very recently reinforced that planning policy must respect the Green Belt which has five purposes:

• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to preserve the setting and special character of historic towns; and
• to assist in safeguarding the countryside from encroachment;

Government has stated that the construction of new buildings should be regarded as inappropriate for the green belt because one of the characteristics of the green belt is its permanence. The effect of building on this land, especially at a high density, cannot be reversed - trees, plants and animal habitats are lost and the character of the locality is irreversibly damaged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14985  Respondent: 15609473 / Ed Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is essential that the assumptions underlying the stated need for nearly 14,000 additional homes are transparent and open to scrutiny. These assumptions should now be reviewed in the light of the outcome of the Referendum on leaving the EU as this could well reduce the demand for homes in commuter towns. The document emphasises the need for homes for all and to have homes that are flexible to meet changing needs but how this will be achieved is not explained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14988  Respondent: 15609505 / Frank Ray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I object to not protecting the Green Belt (Policy P2)**

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are **no exceptional circumstances** for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing **brownfield** site at Burnt Common rather than developing Garlick’s Arch (A43).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/14987  **Respondent:** 15609505 / Frank Ray  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

1. **I object to the Local Plan as the development proposed is not sustainable (Policy S1)**

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development should be in urban areas where there is sustainable transport. Traffic congestion, air quality is already a problem, and a loss of habit is seriously worrying.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/6883  **Respondent:** 15609569 / Nicola Shouesmith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/759</th>
<th>Respondent:</th>
<th>15609569 / Nicola Shouesmith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object very strongly to the latest draft of the GBC local plan.

This still proposes to inset East Horsley from the Greenbelt. The development of 100 homes is proposed near Horsley station and over 2000 on the Wisley Airfield. The village of East Horsley (and surrounding villages such as West Horsley, Effingham and Ripley) do not have the infrastructure in terms of transport (roads, parking or rail), schools or medical facilities to adequately meet this increased demand.

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land is land that was supposed to be protected for future generations.

Since Brexit, forecasts of increasing population numbers have been significantly reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6885</th>
<th>Respondent:</th>
<th>15609633 / Peter Watts</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A15</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The land on the slopes of Stag Hill was designated Protected Open Space in 2003. There is no good reason to change this now. Guildford town centre needs its green spaces protecting, not eroding, especially in light of the vast tracks of housing development along the river / railway.

In addition the change of status would impact on the local community and the very unique nature of the Ridgemount / Arlesford environ, where an almost country side feel has been established in the heart of Guildford. The hedgerows backing onto the Cathedral fields are very much part of this, as is the housing only on one side of the road. Plus the views of the Cathedral from the opposite slopes of the Downs are magnificent and need protecting from urban sprawl.

I would significantly question the rationale for this change which seems to be purely based on the Cathedral's planning application to develop the site. It seem to be an example of cronyism.

It is very evident that this site is not appropriate for building due to (i) its history of problems relating to subsidence and drainage, (ii) extensive piling would be required to develop with consequent repercussions on neighbouring houses in Ridgemount, Arlesford Road, Benbrick Road, Stag Hill, and Scholars Walk, (iii) the rainwater run-off from the site has caused drainage and minor flooding issues, particularly affecting Ridgemount, which would be exacerbated by further development, (iv) there is a well-documented traffic problem in this area which is only going to be made worse by the proposals for development of Guildford Park Car Park and Guildford Station. The addition of 100 houses on the Cathedral hill site will add in excess of 150 vehicles to this already problematic scenario, and (v) the reason for change of status is political rather than the suitability of the site for housing.

I therefore object to the change in status of this site to C3 housing on the grounds that it is inappropriate for development due its location, and any development would have a negative impact on the surrounding community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3586  Respondent: 15609665 / Karen Morse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am very disturbed and perturbed by the Guildford Borough Council plan.

I have resided in Ripley over the past nine years with my family.

The idea of all erosion of the Green Belt is shocking.

I object to any removal of any villages from the Green Belt. Once the Green Belt is lost we could never get it back. This cannot be.

The idea of the volume of houses proposed in the plan is outrageous. The area is totally unsuitable for the volume of people and traffic that your plan has proposed. Chaos for our local road network would be inevitable.

The lanes and country roads are not suitable for the volume of people and cars that you are planning to bring into the area and surroundings.
I am also very concerned and object to the last minute inclusion of new sites included in the plan with less than two weeks notice. Why and how did this happen?

Has there been any thought that new schools and Doctors Surgeries would be need to be provided for the vast volume of people that would be in the area?

As you can see by my points of view to the Guildford Borough Council plan, I have many heartfelt objections.

SAVE THE GREENBELT!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3600  Respondent: 15610081 / Sarah Kelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

1. NO EXCEPTIONAL CIRCUMSTANCES

The local plan proposes nearly 9000 new homes to be built on Green Belt land (compared with ~ 50 000 current homes in Guildford, so approx. equal to 18% of the existing homes in the borough) – a huge proportion. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. No exceptional circumstances have been disclosed. So the Green Belt boundaries should NOT be changed through the plan making process.

1. BROWNFIELD AVAILABLE

There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to
cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.

1. DRAINS, WATER SUPPLY, FLOOD RISK, CONGESTION

Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed number of new homes. Building this number of homes will lead to flood risk here and downstream (along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

In conclusion, I must ask you to revise the housing number, and to amend the Local Plan to utilise brownfield land rather than green field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15073  Respondent: 15610081 / Sarah Kelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the expansion of commercial land in the urban area losing the potential for further housing. Policy E7: Guildford Town Centre

There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15068  Respondent: 15610081 / Sarah Kelly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15071</th>
<th>Respondent:</th>
<th>15610081 / Sarah Kelly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15070</th>
<th>Respondent:</th>
<th>15610081 / Sarah Kelly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15066  Respondent: 15610081 / Sarah Kelly  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c.7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15064  Respondent: 15610081 / Sarah Kelly  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Local Plan as the development proposed is not sustainable (Policy S1).

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will require a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3601  Respondent: 15610113 / Paul Mullarkey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan includes some targets for housing need, which are exaggerated because of some flawed assumptions - as demonstrated by other experts (GRA Report). Also Guildford is not choosing to constrain its overall growth as other places in Surrey are doing legitimately and thereby coming out with lower needs. I would urge Guildford to adopt the practice of other boroughs in the county, particularly given the constrained geography of Guildford as a gap town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15085  Respondent: 15610113 / Paul Mullarkey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am opposed in principle to unjustified expansion of the Green Belt. The Green Belt was introduced to separate communities and provide areas free from development. It should be sacrosanct where there are clearly viable alternatives.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/15087  Respondent: 15610113 / Paul Mullarkey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It seems to me that Guildford is using this plan to identify all potential greenfield sights in this plan and leaving nothing to future generations- a flawed policy. We should be exploring the use of brownfield site and looking at the housing stock that is actually needed. The entire student population can and should be accommodated on the Campus site leaving large amounts of housing available for rental in the town. Allowing homes for the elderly will potentially free up family houses and at the same time address the growing problems of isolation in old age in Guildford and surrounding areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6901  Respondent: 15610177 / Kathleen Atkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed development in Normandy and Flexford which will mean the complete destruction of its rural environment. I appreciate that more housing is required but the scale of this proposal can only result in a chaotic situation for Normandy.

The traffic situation is already getting out of hand - with queues often forming to get on to the Aldershot Road.

Has consideration been given to the excessive noise and pollution which will undoubtedly result from a development of this size?.

Will the Normandy Surgery be able to cope with the vast increase in numbers?

I worry also about the destruction to wildlife in the area.
My home has been subject to a bit of flooding during the past 5 years. I have now put in place gulleys etc. to try to prevent this happening again. Am I now to be concerned about what might happen if this development goes ahead. Drainage problem??

I understand that there are schools in the area around this Parish which are undersubscribed, so do we need another school?

Our precious countryside needs protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5061  Respondent: 15610177 / Kathleen Atkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15098  Respondent: 15610305 / Lesley Falknor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I understand that Guildford are trying to provide more homes for younger people in the area and whilst this is a good and needed plan, I have to object due to the fact that NO account has been made for the road infrastructure around Guildford and particularly my village of Compton, where I live on the main street through Compton. Our village life has been ruined due to the heavy traffic on this B Road! More houses will exacerbate this problem as rarely do drivers do even the 30 Mph, asked for.

The council have consistently ignored our requests about this and I have to object to the development which seems to exceed the number of houses that I feel that field could accommodate comfortably and for quality of life. I believe 1,800 are planned with an 'industrial park' added to it? Down Lane, running on one side of the field is already a small road as you know and can't handle the numbers you seem to expect as this road will be used.

For our problem in Compton, please immediately place a 25mph zone from Cyprus Farm to just beyond St Nicholas Church or even Lemon Tree Restaurant. Which is to be enforced by a camera at all times. We need an electronic board at either end permanently showing 25 mph. We also need a pedestrian crossing immediately outside Mission Cottage gate to go over to the right hand side of Eastbury lane, presently has no pavement area and this can be built on this corner (I could show you) there is nothing there except an impromptu flower bed, this crossing must have a traffic light. More and more of us, who have no driveways are forced to park our cars in Eastbury Lane and it is DANGEROUS! to cross this road as the traffic does not slow down. I have elderly relatives and a newborn grandson. I don't allow my family to cross this road, we have to use the layby outside my neighbours house - 'the old post office', I have to drop them off, as well as heavy shopping and then park my car in Eastbury Lane. A walk into my village is fraught with worry as large lorries Sainsburys and Waitrose vans etc., drive very close to us on the pavement, they need to slow down.

It is very very obvious that if Guildford County Council want to provide more homes, then massive investment needs to be given for a series of tunnels under the south and east of Guildford linking up the A3 with Godalming and the Shalford, Cranleigh and Dorking areas. We are in a conservation area but this is completely wrecked by the traffic. You can't have it both ways. Show me the investment and plans for the traffic, then I will show you support for what you are trying to do if the numbers and plans make sense. We are not unreasonable but the council is ignoring us and you are ruining the quality of our lives, putting our lives in danger and affecting our house prices by the heavy traffic involved. I cannot support this at the present time and I OBJECT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6909  Respondent: 15610337 / Pippa Scammell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to support the need to preserve all the allotments that we have in Guildford. Allotments give people the opportunity to have recreational benefits without costing them a great deal. They are areas of peace and tranquility which allow people to relax and unwind after busy work days. My husband has had an allotment for just one year, but has seen already the benefit in helping him relax and be less stressed.

It is not only people who benefit by the existence of allotments, they are a haven to wildlife and oasis of green in the ever-increasing proliferation of housing needs.
I would urge you to resist the temptation to build on allotment land for new housing however attractive that might be from a commercial point of view.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3609  Respondent: 15610401 / Malvern Dann  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the scale of the proposed building expansion on green belt land in Normandy, labelled A46/A47 on the strategic plan for the reasons listed below.

As a resident of Normandy for more than 40 years I treasure the rural aspect that harbours ancient woodlands, protected species, charitable enterprises and provides an oasis of calm traditional countryside that serves the 3 sizeable towns that surround it—Guildford, Farnham and Aldershot. The footpaths and woods are well used by walkers who use the short train journey from the above towns to reach and enjoy open countryside.

I do recognise the need for the provision of more varied housing, not only to fulfil the needs of the strategic plan but also to keep the village vitalised, but this should not be at the expense of the preservation of our green belt and the swamping of the existing village and residents. We do not need an extensive retail space as there are several in the area plus small supermarkets. We already provide space for fairground storage and travellers’ accommodation, more of which are included in the plan which seems excessive.

The proposed development would more than double the housing stock in the village. Once this land is built on it will forever change the environment and character of the area and we will be left with one big urban sprawl. We should protect the spaces we have and look to infill in already developed areas or build small contained developments that will enhance the environment instead of destroying it.

• The infrastructure cannot support this plan in any way. The village is sandwiched between the A31 and A323, two small country lanes, Wanborough Hill and Glaziers Lane connect these 2 roads. They also also serve the A3 and provide an access route to the M25, Blackwater Valley Route and M3. If anything unusual happens on these roads, such as road works, accidents, floods, the whole village becomes gridlocked as traffic attempts to find alternative routes. So a large part of my objection is based on the fact that our roads could not support the traffic from another 1000+ houses, and there seems little scope for altering these in any significant way.

• The proposed land for the development is green belt land. It is proposed that by building a secondary school this would override the protection that this status offers it. There is no proof that a school is needed in this area as the local schools are NOT fully subscribed. Incoming students from outside the area would create more traffic on already overcrowded roads. There is an argument that the train station would provide a good transport link for both commuters and students but the cost of train tickets, especially for a family with more that 1 child, are prohibitive.
I have no technical knowledge but from walking the footpaths, woods and fields for the last 40 years I know how soggy and wet the ground all around is, even in the summer time. This does not bode well for the developments. How will the ground water round the buildings be dispersed and how will the environment be affected by the extra ground works that will be needed to service the needs of the housing. Will you be building houses that in the future will be white elephants as they could be uninsurable or unsustainable due to flood/water threat.

A final point is the disruption that such sustained building would make on the area for several years, with heavy works vehicles that would put additional strain on small country lanes and overcrowded local roads and cause distress and inconvenience to the local community should the development as proposed go ahead.

To sum up I believe that this development as proposed is led not by the need of the community, either local or wider, but by greed of a few developers.

The council should try a more imaginative and sustainable plan and I object to the plan as proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6921  Respondent: 15610433 / Clare Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6919  Respondent: 15610433 / Clare Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15116  Respondent: 15610433 / Clare Porter  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15120  Respondent: 15610433 / Clare Porter  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15110  Respondent: 15610433 / Clare Porter  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15122  Respondent: 15610433 / Clare Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15124  Respondent: 15610433 / Clare Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy 12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15118</th>
<th>Respondent: 15610433 / Clare Porter</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>** I object to poor air quality concerns (Policy 13)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15108</th>
<th>Respondent: 15610433 / Clare Porter</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>** I object to not protecting the Green Belt (Policy P2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15112</th>
<th>Respondent: 15610433 / Clare Porter</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15106  Respondent: 15610433 / Clare Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructur. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15114  Respondent: 15610433 / Clare Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPA16/3614  **Respondent:** 15610465 / Tess Corlett  **Agent:**

*Document:* Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

**I object to the proposed Infrastructure Schedule (Appendix C)**

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/3612  **Respondent:** 15610465 / Tess Corlett  **Agent:**

*Document:* Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

**I object to the figure of 693 houses per annum in the borough being too high (Appendix D)**

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/6920  **Respondent:** 15610465 / Tess Corlett  **Agent:**

*Document:* Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic
** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15123  Respondent: 15610465 / Tess Corlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15117  Respondent: 15610465 / Tess Corlett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15113  Respondent: 15610465 / Tess Corlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

** I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3613  Respondent: 15610529 / Mark Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPA16/3611  Respondent: 15610529 / Mark Ransome  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough. This is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPS16/6917  Respondent: 15610529 / Mark Ransome  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but Guildford Borough Council have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- The site is liable to frequent flooding
- There are no plans to improve local schools, medical facilities or other utilities to cope with the development.
- There is no sustainable transport infrastructure.
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPS16/6916  Respondent: 15610529 / Mark Ransome  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

---

Page 505 of 2988
North facing ramps to the A3 at Burnt Common would have a disastrous impact on local communities. Without additional measures to improve traffic flow around the Burnt Common round-about the addition of the slip roads will draw in a huge amount of ‘through’ traffic that will turn an already busy round-about into traffic jam hot spot.

This is not sustainable as this cannot be improved due to housing developments around the round-about.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15130  Respondent: 15610529 / Mark Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15127  Respondent: 15610529 / Mark Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is too much traffic in our villages already. The roads are busy throughout the day and not just at rush hour. This plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths.

Instead of building 5000 more houses which means dangerous and unsustainable traffic. The money would be better improving those roads so local communities can use them safely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15131  Respondent: 15610529 / Mark Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15126  Respondent: 15610529 / Mark Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the result will be an urban sprawl. Like many other residents I chose to move to Ripley because it was in the Green Belt.

Section 4.3.12 quotes “only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt”.
Ripley, Send and Clandon all meet this criterion. If this was not so, why were these villages part of the Green Belt in the first place? To suggest otherwise is just a matter of opinion and not a statement of fact. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15128  Respondent: 15610529 / Mark Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is too much traffic in our villages already. The roads are busy throughout the day and not just at rush hour. This plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths.

Instead of building 5000 more houses which means dangerous and unsustainable traffic. The money would be better improving those roads so local communities can use them safely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15125  Respondent: 15610529 / Mark Ransome  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Building 13,860 new houses in such a small area is clearly not sustainable. The over development of Ripley, Send and Clandon will effectively turn them into one conurbation. The local communities don’t need these houses. Where is the transport infrastructure for the Wisley Airfield (A35) and Garlick’s Arch (A43) developments? They have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick's Arch.

The development needs to be relocated to urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough. There is far too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The Raleigh School in Horsley is full every year and secondary school places are limited at the Howard of Effingham. Further development in surrounding area would result in families who have lived in the village for a number of years not being able to send their children to the local school which is totally against the ethos of a village community.

The villages of Horsley offer a small Post office and library to the local residents. Any significant increase in the local population would put extensive pressure on these facilities. Parking is also very difficult at all times of the day in and around the villages. Again, an increase in people wanting to use the village presents parking challenges as there is no obvious area of where extensions can take place and will also increase congestion. There are a lot of elderly people and children who visit both of the East Horsley village parades and an increase in traffic poses significant safety risks.
The Horsley medical centre in Kingston Avenue already services a large number of patients but it is extremely busy and it is often difficult to get appointments. An increase in the local population would further exacerbate this issue and also put additional pressure on the wider health service and the Royal Surrey County Hospital.

In conclusion, although I appreciate a need for housing within Surrey, the quota that has been identified for the Horsleys, Ockham and surrounding areas is a significantly unfair proportion. As I have mentioned in my correspondence, the proposals will have a significant degrading to the well being of the residents of the area and destroy the habitat, charm and character of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15143  Respondent: 15610561 / Jo Graham  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The area is not designed to take a huge influx of residents or vehicles. There is often flooding in the area, draining is insufficient and the infrastructure and road network is barely able to cope as it is.

Flooding of Ockham Road, the roundabout at Ockham Park (at the site of the Wisley proposal), Plough lane, Old Lane, Lower Road in Effingham are specific examples where there was significant flooding in the last two years which has caused damage to property, vehicles, roads not to mention the additional congestion this caused. The proposals that are suggested in the latest application do not go far enough to resolve any of these issues.

The roads in the area are not suitable for the additional volume of traffic and I would classify a number of them as country lanes. There are real examples of where roads are breaking up, repeated potholes, drains sinking as well as being dug up for utilities repairs and hence can barely cope with the current situation. Examples are Ockham Road (both North and South), Forest Road and the Drift.

As a keen cyclist, these poor road conditions make it challenging enough to ride on and I have significant concern on my safety should there be additional traffic on the roads, particularly as I have mentioned above that they are winding country lanes.

The proposal of the additional housing plus support and delivery vehicles would create a significant increase in traffic volume. The 2011 census indicated an average car ownership of 1.51 per household and no doubt that figure has risen since thus causing a significant increase in road users which the local infrastructure cannot support. As a daily user of the A3 and M25, the congestion is already extreme. During the week, traffic is already queuing for the M25 by 6.45am and this is likely to get worse should these proposals go ahead.

I believe the proposal to put these additional houses on the edge of the A3 / M25 will have severe impact on this already stressed journey and there are no proper proposals put forward to help justify or accommodate.

The rail network does not fair much better with trains to London already at capacity. During the week, the car park at both Horsley and Effingham Junction are busy to full. No doubt residents of the proposed developments would wish to use these stations and so would result in insufficient parking / cycle park facilities. Again, the proposal does not offer any suitable
sustainable alternatives which would be acceptable from an environmental perspective or to the local residents and infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15140  Respondent: 15610561 / Jo Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Protection of the Greenbelt

This proposal is a massive encroachment of the Metropolitan Green belt and the size of the development is totally inappropriate. The development will fundamentally change the character of the surrounding villages and will result in over development of an area which can be classified as an area of natural beauty.

The villages are set in a parish of well established, well spaced out, low rise housing with a considerable number of historic buildings. The developments as proposed would destroy the character and charm of the area that the residents of Horsley and surrounding areas have respected, protected and loved for decades.

I have previously commented and objected to recent planning proposals of this scale. The creation of a ‘town’ on the Wisley airfield will destroy a site of Nature conservation importance, create additional pollution and adversely impact the tranquillity and character of the local area.

The new proposal of houses in Horsley and the surrounding villages further creates a detrimental environment from a social and environmental perspective

I grew up in East Horsley and after careful saving, was fortunate to return to live in the village to where I consider home, offering the peaceful lifestyle I require and raise my own family. Any developments in the area will considerably change this profile and potentially threaten my lifestyle choice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6926  Respondent: 15610657 / Jennifer Hayward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Submission Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I STRONGLY OBJECT to the draft Local Plan for the following key reasons:

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs. I object to the detrimental impact on transport, local roads and road safety.

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

• After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

• Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6929 Respondent: 15610753 / Jim Perrin Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 512 of 2988
As a regular visitor and former resident of East Horsley, I object to the draft Local Plan for the following key reasons:

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

• I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.
Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3619  **Respondent:** 15610785 / Liz Vinall **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3618  **Respondent:** 15610785 / Liz Vinall **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6931  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital  Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6937</th>
<th>Respondent:</th>
<th>15610785 / Liz Vinall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space, and it hides Guildford town from visitors until they pass the off-slip road at Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the Doomsday book and beyond. It would be hugely detrimental to the rural feel of West Clandon and the agricultural outlook from the boundaries of the village.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will increase traffic on the A3, which already has stationary traffic every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have significant health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6932  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces
pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6938  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, potentially capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6939</th>
<th>Respondent:</th>
<th>15610785 / Liz Vinall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. THIS PROPOSAL APPEARS NOT TO HAVE BEEN PROPERLY THOUGHT THROUGH.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/15185</th>
<th>Respondent:</th>
<th>15610785 / Liz Vinall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15192  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15193  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/15182  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15183  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15195  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for “Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:
1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a luxury and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15219</th>
<th>Respondent: 15610785 / Liz Vinall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for over-development. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already and West Clandon already sees regular visits from Inner London schools training for Duke of Edinburgh awards and from Ramblers. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability. The unspoilt views from the North Downs over Green Belt villages protects the environment that these visitors come to see.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15191  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15189  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15190  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to other towns, and within the London Commuter belt, no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15194  Respondent: 15610785 / Liz Vinall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.
The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15218 Respondent: 15610785 / Liz Vinall Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15186 Respondent: 15610785 / Liz Vinall Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to
court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPP16/15187   Respondent: 15610785 / Liz Vinall   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make
the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/15188  **Respondent:** 15610785 / Liz Vinall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental
impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north
east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans.
This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will
have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/15180  **Respondent:** 15610785 / Liz Vinall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and
should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone
it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future
generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly
protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the
borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

Page 538 of 2988
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contrac- ted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3998  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3999  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

   ° The “objectively assessed need” figure of 693 homes a year is too high.

   ° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

   ° The current SHMA inflates the proposed housing figure due to
failure to correct for errors in the historical data for international migration flows,

issues with the way it considers students and affordability and

flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3621  Respondent: 15610913 / Gillian Hague  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plans, particularly with regards to the proposed developments around West Clandon, are totally disproportionate to the existing communities and infrastructure and would hugely change the character of our villages, destroy the character that is cherished by so many;

The Street in West Clandon (A247) is not appropriate for increased traffic (which would inevitably result from the proposed developments at Garlick’s Arch and / or additional access to / from the A3 at Burnt Common. In particular the road is extremely narrow in several places, has numerous houses with driveways that need to use mirrors to see traffic coming down the road; has dangerous and poor visibility junctions at the station and at the Onslow Arms pub/restaurant and following the 2012 Olympic Games the A247 has seen a huge (and in my view very welcome) increase in road cyclists using the road to access the Surrey Hills from Woking and further afield. For all of these reasons any plans that would increase traffic flow on this road would heighten danger both to road traffic and to residents of West Clandon who need to access and cross the road on a daily basis.

The Street in West Clandon is also inappropriate for increased traffic due to the pedestrian use – the village is spread along the road so residents need to walk along the footpaths but these are also narrow in places (in particular near the school), they are only on one side of the road or the other in several places necessitating residents to cross the road frequently; and for example the church car park is across the road from the church itself – with corners creating poor visibility and a dangerous situation for elderly or less mobile residents attempting to cross the road. The number of places that crossing the road is an issue are too numerous for pedestrian crossings to be a realistic solution.
The scale and location of the proposed developments would result in the loss of treasured and unique green belt land for ever – ill thought through and unnecessary intrusion into the Green Belt will result in permanent loss for future generations;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/3996  Respondent:  15610913 / Gillian Hague  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

My KEY OBJECTIONS are as follows:

• The plans, particularly with regards to the proposed developments around West Clandon, are totally disproportionate to the existing communities and infrastructure and would hugely change the character of our villages, destroy the character that is cherished by so many;

• The Street in West Clandon (A247) is not appropriate for increased traffic (which would inevitably result from the proposed developments at Garlick’s Arch and / or additional access to / from the A3 at Burnt Common. In particular the road is extremely narrow in several places, has numerous houses with driveways that need to use mirrors to see traffic coming down the road; has dangerous and poor visibility junctions at the station and at the Onslow Arms pub/restaurant and following the 2012 Olympic Games the A247 has seen a huge (and in my view very welcome) increase in road cyclists using the road to access the Surrey Hills from Woking and further afield. For all of these reasons any plans that would increase traffic flow on this road would heighten danger both to road traffic and to residents of West Clandon who need to access and cross the road on a daily basis.

• The Street in West Clandon is also inappropriate for increased traffic due to the pedestrian use – the village is spread along the road so residents need to walk along the footpaths but these are also narrow in places (in particular near the school), they are only on one side of the road or the other in several places necessitating residents to cross the road frequently; and for example the church car park is across the road from the church itself – with corners creating poor visibility and a dangerous situation for elderly or less mobile residents attempting to cross the road. The number of places that crossing the road is an issue are too numerous for pedestrian crossings to be a realistic solution.

• The scale and location of the proposed developments would result in the loss of treasured and unique green belt land for ever -ill thought through and unnecessary intrusion into the Green Belt will result in permanent loss for future generations;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
14. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what
the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West
Clandon, gives Burpham a defined green boundary and breathing space, and it hides Guildford town from
visitors until they pass the off-slip road at Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with
paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All
requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops,
offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back
to the Doomsday book and beyond. It would be hugely detrimental to the rural feel of West Clandon and the agricultural
outlook from the boundaries of the village.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before
the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will increase traffic on the A3, which already has
stationary traffic every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars
through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every
day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two
schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham
which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a
dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it
wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be
uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West
Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have significant health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7442  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7443  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) would have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7445</th>
<th>Respondent:</th>
<th>15610913 / Gillian Hague</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, potentially capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).
This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7446  Respondent: 15610913 / Gillian Hague  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of “through” traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. THIS PROPOSAL APPEARS NOT TO HAVE BEEN PROPERLY THOUGHT THROUGH.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15213  Respondent: 15610913 / Gillian Hague  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) would have a permanent impact on the character of the Ancient
Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16558  Respondent: 15610913 / Gillian Hague  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)
If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a
Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and
storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. The
Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site. Any increase in
traffic will adversely impact the A247 through West Clandon (see my opening comments). In addition, given rail transport
links to Guildford, Woking and Greater London local employment appears a secondary priority not sufficiently pressing to
risk the future of the Green Belt for future generations for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15211  Respondent: 15610913 / Gillian Hague  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )
I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15212  Respondent: 15610913 / Gillian Hague  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16579  Respondent: 15610913 / Gillian Hague  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for over-development. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already and West Clandon already sees regular visits from Inner London schools training for Duke of Edinburgh awards and from Ramblers. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability. The unspoilt views from the North Downs over Green Belt villages protects the environment that these visitors come to see.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16568  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. The Hog’s Back is a stunning landscape which should not be damaged.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16577  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16561  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I STRONGLY OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. Please refer to the key points highlighted at the beginning of this letter. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion and difficulties/danger in accessing, crossing or simply walking along the road. Further development around these villages will only result in more traffic, more parking problems and significantly greater danger to pedestrians, car users, residents and visitors trying to access the road and the numerous cyclists now using the roads as routes in to the Surrey Hills as a result of the Olympic legacy.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements or when pedestrians need to cross from one side of the road to the other (for example at the station entrance).

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and
suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of The Royal Surrey Hospital in Guildford, how is this to be assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16563  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16566  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16556  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16557  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site. Situated as we are so close to the North Downs we are very aware of the ability of water levels to rise in this site very quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16552  Respondent: 15610913 / Gillian Hague  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and West Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/16555  Respondent: 15610913 / Gillian Hague  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

   1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
   2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
   3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

   These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

   It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2890  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E. Policy S1 Presumption in favour of Sustainable Development – My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/554  Respondent: 15610913 / Gillian Hague  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

G. Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green
Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3622</th>
<th>Respondent: 15610977 / Dermot Gleeson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>1. The methodology used to set the annual housing target has not been adequately explained or justified.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15209</th>
<th>Respondent: 15610977 / Dermot Gleeson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>1. The arguments used to justify the proposed invasion of the Green Belt ignore repeated statements by Government Ministers, including the Prime Minister, before the last Election that the commitment to protect the Green Belt 'trumps' the absence of a five year land supply.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3632</th>
<th>Respondent: 15611105 / Ramsey Shubbar</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPA16/3630</td>
<td>Respondent: 15611105 / Ramsey Shubbar</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>----------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6947</th>
<th>Respondent: 15611105 / Ramsey Shubbar</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6946  Respondent: 15611105 / Ramsey Shubbar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15235  Respondent: 15611105 / Ramsey Shubbar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15241  Respondent: 15611105 / Ramsey Shubbar  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)</td>
</tr>
<tr>
<td>The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15228  Respondent: 15611105 / Ramsey Shubbar  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)</td>
</tr>
<tr>
<td>This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15246  Respondent: 15611105 / Ramsey Shubbar  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15247  Respondent: 15611105 / Ramsey Shubbar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15240  Respondent: 15611105 / Ramsey Shubbar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15223  Respondent: 15611105 / Ramsey Shubbar  Agent:
I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15229  Respondent: 15611105 / Ramsey Shubbar  Agent:

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15220  Respondent: 15611105 / Ramsey Shubbar  Agent:

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The volume of proposed housing will damage local communities including Ripley, and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads which require significant improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15234  Respondent: 15611105 / Ramsey Shubbar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3633  Respondent: 15611137 / Scott Hutchinson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3629  Respondent: 15611137 / Scott Hutchinson  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
</tr>
<tr>
<td>I object to the figure of 693 houses per annum in the borough being too high (Appendix D)</td>
</tr>
<tr>
<td>GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6948  Respondent: 15611137 / Scott Hutchinson  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
</tr>
<tr>
<td>I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)</td>
</tr>
<tr>
<td>Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6945  Respondent: 15611137 / Scott Hutchinson  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
</tr>
</tbody>
</table>
I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15239  Respondent: 15611137 / Scott Hutchinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15224  Respondent: 15611137 / Scott Hutchinson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3634  Respondent: 15611201 / Jed Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3627  Respondent: 15611201 / Jed Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6949  Respondent: 15611201 / Jed Alexander  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6944  Respondent: 15611201 / Jed Alexander  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15237  Respondent: 15611201 / Jed Alexander  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15243</th>
<th>Respondent: 15611201 / Jed Alexander</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15226</th>
<th>Respondent: 15611201 / Jed Alexander</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15244 | Respondent: 15611201 / Jed Alexander | Agent: |
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15249  Respondent: 15611201 / Jed Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15238  Respondent: 15611201 / Jed Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15225  Respondent: 15611201 / Jed Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15231  Respondent: 15611201 / Jed Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15222  Respondent: 15611201 / Jed Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The volume of proposed housing will damage local communities including Ripley, and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads which require significant improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15232  Respondent: 15611201 / Jed Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6951  Respondent: 15611361 / Elizabeth Maycock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to object to the inclusion of this site again in the latest draft of the Local Plan as a strategic site for development. A planning application for this site in effectively the same terms was decisively rejected a few weeks ago on clear and logical grounds. It is difficult to understand what could have changed in that few weeks. The arguments against building in the Green belt remain the same. The site can only be removed from the Green Belt on exceptional circumstances and the Local Plan provides no details as to what these may be. Unfulfilled housing need is not an exceptional circumstance for these purposes. I also object to the inclusion of this site on the grounds of poor sustainability. There are no transport links or other services such as schooling, shopping or medical services which means that these will have to be provided by the existing stretched services in the surrounding area or provided from new. The number of houses proposed can only generate
ia massive increase in vehicle use of the local narrow roads and add to the existing problems at the A3/M25 junction 10. At an average of two cars per dwelling, there will be an increase of some 4000 extra vehicles on local roads. There will also be many more passengers on the trains at East Horsley and Effingham stations at both of which there is almost no excess parking available now. The same difficulty will arise in relation to parking at the shops in East Horsley. As the area immediately surrounding the site is prone to flooding, the proposed development will require extensive improvements to surface and waste water infrastructure to cope with the much increased surface water run off and extra foul waste. The existing infrastructure simply cannot cope with such an increase in population.
Ockham village currently numbers 159 dwellings and its present setting will effectively disappear if this site is developed as proposed. The concept proposed is completely out of keeping with the established pattern of development in the area and would be the largest in Guildford Borough other than Guildford itself with a density would be about 49 dwellings per hectare. East Horsley is presently the largest settlement outside Guildford town, having 1760 homes at a density of 8.1 dwellings per hectare. The disparity is stark and emphasises the fact that the proposed development is wholly out of local context. It even appears to breach Guildford Borough Council's own proposed Housing Policy (H1). I also object to the allocation of housing in this part of the Borough which is disproportionate in relation to the Borough as a whole. Calculation shows that 23% of the Local Plan's new housing is proposed in the localities of Ockham, Ripley, Send and the Horsleys and of this 65% is allocated to the former Wisley Airfield. This is wholly unreasonable and unjustified by the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/584  Respondent: 15611361 / Elizabeth Maycock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Nothing is being put forward following last year's Consultation to improve the sustainability of the proposed West Horsley development sites and it is questionable whether it meets National policy requirements. The West Horsley Parish Council response to the consultation states that neither they nor, they believe, was any other parish council invited to "engage in early essential collaboration" as advised in the NPPF Plan Making - Local Plans. It is entirely probable that every home on the West Horsley sites will need a minimum of one car (and maybe even two) to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel - even now cycling and walking in these lanes is dangerous at any time. I wholly agree with my Parish Council in rejecting the proposed 35% growth (which seems grossly disproportionate) in our village housing stock on unsustainable sites over the first 5 years of the plan.
The housing numbers proposed in the draft Local Plan continue to be unsound in that they remain derived from a flawed Strategic Housing Market Assessment. The Independent review of these assessed housing needs set out in Appendix 1 to the West Horsley Parish Council response of 18 July 2017 to the present consultation suggests that there are significant errors in the OAN West Surrey SHMA. which, if accepted, would significantly lower the numbers of houses required. As before, there is nothing in the Local Plan which indicates that any housing proposed to be built in either of the Horsleys will be of the kind actually required by the villages.

The recent successful appeal for the creation of SANG in Long Reach in West Horsley (not in the Local Plan as such) was said to be justified by the needs of Guildford and surrounding area. This is laughable for managed space in the form of an urban park does not replace actual countryside which has been built over.

I continue to object to the lack of provision for sustainability, be it in housing, transport or in other aspects of the current draft of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: psp172/4043  Respondent: 15611361 / Elizabeth Maycock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows, in the draft Local Plan. Much of the above general comment is also applicable to this site. Primarily, the proposal removes 3.1h of land from the Green Belt without any justification. There are no special reasons for this as such for it is effectively unsustainable because of its location and the constraints of the site. Junction 10 of the M25 is already unworkable at times and even the proposed improvement of the junction (how many years away?) will not alter the totally restricted access to this site from the A3/M25. In this respect, it will rely at that end on the same junction on the A3 as RHS Wisley, a major visitor attraction with its own plans for expansion. The access at the other end of the A35 site is from narrow country lanes and any substantial increase in traffic including bus services there will make them even more dangerous than they are now and increase the deterrent effect on walking/cycling to the sewerage, lack of medical service, schools, transport connections in the surrounding areas as well, all contributing to the site's total unsustainability.

Quite apart from the wholly unsustainable nature of the site on all levels. any substantial development of it, such as that presently proposed and under appeal, will have an overwhelming effect on the Horsleys and other nearby villages, already faced with proposals for their own expansion in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: psp171/2145  Respondent: 15611361 / Elizabeth Maycock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Despite the volume of comments received, I object to the fact that no change has been made to the proposal that the Horsleys should be both removed from the green belt and that the settlement boundaries be extended at the same time. I welcome the reduction by 90 in the number of new homes projected for west Horsley but the draft plan still proposes far too many new homes on green belt land and, additionally, the east side of the borough is now to take an even greater proportion of these. should not Guildford follow the choice of many reduced objectively assessed housing target will mean that Guildford will have grown by nearly 25%, nearly double the prediction for the growth of Guildford made by the office for national statistics, by 2034 (the end of the Plan Period).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3635     Respondent: 15611393 / Alison Bishop Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having appraised the proposed plans for West and East Horsley, Ockham and Wisley I am horrified by the scale of the proposals - these will alter the character of the villages for ever plus put an enormous strain on the ever burgeoning demand currently expected of the facilities and utilities.

The safety of the villagers should be re-considered in view of the increased volume of road traffic on very narrow twisty roads that are already under strain due to previous in-filling/developments plus from the effect this number of people will have on the level and standard from the Doctors, schools, utilities, amenities, rail transport, road links etc. These are currently full or at bursting point. Many of them are limited by the size of their sites or capacity they were built to take.

The villagers have made a deliberate choice to live in small villages and certainly speaking for myself, I do not take kindly to having the area developed in such a huge way. As far as I can see they can only be detrimental on so many levels; and for these reasons I request you re-consider your proposed plans for these lovely villages. They were not meant to take the volume of people you are proposing to accommodate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6953     Respondent: 15611457 / sam collins Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3636</th>
<th>Respondent: 15611489 / Emma Meekings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Chilworth</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I am writing to object to the plans to the insetting of Chilworth and the removal of Green Belt status on grounds of:

1. Loss of countryside in the beautiful Tillingbourne valley.
2. Intolerable increase in levels of traffic through small communities.
3. Loss of individual character of Surrey villages
I have been a resident in Chilworth for twenty years, having been attracted here by the specific character of the village, namely a single string of houses lining New Road (A248). This enables wonderful access to walking on many footpaths in the lovely unspoilt countryside along both sides of the Tillingbourne valley, including the Down's link, of which many locals and visitors to the area take full advantage.

The unique character of the village has recently been more widely appreciated with the essential clearing work of the heritage site at the old Gunpowder factory works, around which the village originally sprung up. Much money, time and effort has gone into the reclamation from thick undergrowth of the old works and a newly installed information trail is designed to encourage more visitors to come and enjoy the historical significance of our village, once famous throughout Europe. It really is a picturesque setting alongside the Tillingbourne river, with views to St Martha's hill and church having been opened up. A launch event is scheduled for September.

However, since moving here, I have witnessed a steady increase in the amount of traffic on New Road, which peaks at school dropping off and picking up times due to Chilworth infant school and the Tillingbourne middle school situated at either end of the village, both of which are popular schools locally. This causes long queues through the village. There really is no other way for the traffic to go, apart from along New Road. Due to a programme of infilling over recent years, with the development around Chilworth station and St Thomas's Close among others, the increase in traffic has been inevitable such that new residents complain that Chilworth, once a quiet little village, now has a real traffic problem.

Encouraging more visitors to the old Gunpowder works, though welcomed by the locals many of whom have been involved as volunteers in clearing the area, will further add to this traffic congestion.

The loss of Green Belt protection in the area surrounding Chilworth would be devastating, leading to the possibility of Chilworth being subsumed into Blackheath, Albury, Shalford or Wonersh and an intolerable increase in traffic through these small communities. Each of these villages has it's own specific identity and charm, the loss of which would be seriously detrimental to the overall beauty and attractiveness of the Surrey Hills.

I urge the planners and Guildford Borough Council to reject this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPA16/3637  **Respondent:** 15611521 / Sue Woods  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to The New Local Plan regarding the developments proposed with the Horsleys, as well as enlarging the village boundary and removing them from the Green Belt.

Over 500 new homes in the area would have a massive impact on our villages. Bringing 1000 cars, or more, to an area with few pavements, streetlights would bring dangers to pedestrians and cyclists. The railway station car parks are already at capacity, few local buses, and so cars would be used by new residents.

Our villages are important to us, we moved here to live in an area of beauty and peace, slightly removed from urban towns. The infrastructure of our villages would not be able to support the needs of 1000 plus new residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/1700  **Respondent:** 15611553 / Edmund Hodges  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The West Surrey Strategic Housing Market Assessment which informed the provision made for housing in the plan should be revised to reflect the latest 2014 based household projections and the provision proposed in the draft plan increased accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1701  Respondent: 15611553 / Edmund Hodges  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The housing provision proposed in the plan should take account of the latest nationally based household projections and the housing provision proposed in Policy S2 for the plan period (2013-2033) should be increased to a minimum of 17,000 new homes. Provision for the additional new homes should be based on a strategic review of the policy constraints around Guildford.

Such a review should take account in particular travel distances to the town centre and other strategic employment locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6960  Respondent: 15611745 / Anthera Willis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Re: Objection to Guildford Borough Council draft Local Plan

(June 2016) and to the inclusion in the Plan of Site Allocation A35 – the former Wisley Airport – for a new settlement of 2000 dwellings

Dear Sirs,

I am writing to express our extremely serious concern about the above proposal. I realise that we are not Guildford residents but this proposal would affect us much more directly than most people living in Guildford for a number of reasons.
We are very much aware of the vital importance of the Green Belt, which is extremely important for the quality of life in our area. No exceptional circumstances have been established to warrant the removal of the former Wisley Airfield from the Metropolitan Green Belt which in our view should not be tampered with, especially as sufficient brownfield land is available for development elsewhere.

Ockham, Hatchford and Downside would be completely dwarfed by the huge number of dwellings proposed. The size of some of the buildings would appear to be much more suited to an urban environment than a small village and the number of properties would be quite disproportionate to the area proposed. The roads, many of which are small country lanes, are totally inadequate to cope with the huge extra volume of traffic generated, which would also adversely affect air quality in our area which, we understand, already exceeds EU recommended limits particularly round the A3/M25 junction. This would have a detrimental effect on our health. There would be considerably increased danger to pedestrians and cyclists by the huge volume of cars and lorries which would be generated by such a large development and there is no adequate public transport available to cope with such numbers.

All our local services would be stretched far beyond their capacity to cope. Cobham is already very congested with limited parking and this is the obvious place for people from such a development to shop and attend doctors surgeries, dentists, etc. We simply can’t cope with such an increase, which would change the whole character of the area very much for the worse, also having a very damaging effect on local wildlife.

We would urge you very strongly indeed to reject this proposal especially in the light of the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of planning officers with the above serious concerns being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in
relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/6965  **Respondent:** 15612481 / Gillian Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6966  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement—often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a).

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15306  **Respondent:** 15612481 / Gillian Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15342  **Respondent:** 15612481 / Gillian Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15298  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15354  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15337  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15329  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve
the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students
Ire accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s
Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or
other university sites. The plan should take account of the university's ability to house its own students and reduce the
housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is
inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15332  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and
explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk
and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The
price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when
developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location
close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount
of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now
having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the
original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15349  Respondent: 15612481 / Gillian Culmer  Agent:
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15311</th>
<th>Respondent:</th>
<th>15612481 / Gillian Culmer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/15314 | Respondent: | 15612481 / Gillian Culmer | Agent: |
|-------------|----------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15322  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15278  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the
borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of
the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to
justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national
guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional
circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken
out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances
required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have
answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing
exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be
carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in
the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is
the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is
currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land
rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan
rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider
this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and
the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that
the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of
these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that
infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is
all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development,
claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines.
The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this
policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated
to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the
Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could
quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of
opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their
surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an
untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield
(A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15283  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15272  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The road (A247) through West Clandon is particularly hazardous as, in a number of places, two large vehicles are unable to pass in opposite directions without mounting the pavement. Further vehicle movements will result in even more acute congestion, greater pollution and an increased risk of fatal accidents. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15277  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 houses being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is not justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

Page 601 of 2988
The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1702  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set.

   Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1707  Respondent: 15612481 / Gillian Culmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1712  **Respondent:** 15612481 / Gillian Culmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3655  Respondent: 15613953 / Chris White  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my concerns over the proposed 2016 Draft Local Plan and the impact it will have on East and West Horsley and neighbouring villages. Whilst acknowledging that more housing does need to happen and our village should be prepared to "do its bit" I object to the scale of what is being proposed which makes it significantly disproportionate. Three grounds in particular I would like to continue to bring to your attention and specifically object to:

1 Building on Green Belt Land should only be permitted in highly exceptional circumstances.
2 The biggest two proposed developments just don't appear to have been thought through in terms of the necessary infrastructure (schools, medical facilities and parking).

3 Flooding: in recent years it is has been very evident that the drainage system cannot cope so building on land already adversely affected by flooding will only exacerbate the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---
Comment ID: PSLPA16/3657  Respondent: 15613985 / Phoebe Bullman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I am six years old. I have asked my mummy to write this email on her work computer so you can hear what I think.

Please don't build lots of houses in West Horsley. I have asthma and life threatening allergies and my mummy said living in the countryside would help me. If you take away the fields and trees, I won't live in the countryside any more and that makes me a bit scared.

If you take away all the fields and trees, where will the animals live?

My schools is lovely and I have lots of friends. If you make it too big, it will be harder to know everyone and knowing everyone is what makes it friendly and why so many children are happy living in Horsley.

When I am finished in year 6, I want to go to the Howard School as my Reading Buddy Rachel went there last year. If you make lots of new people live here, they won't have room for me. This would be a shame as I don't want to go to school far away and I will miss Rachel even more.

I want to ride my bike and walk to school, but mummy won't let me as the pavements aren't big enough and the cars drive too fast. If you make lots of houses, this will get worse and there will be SO much pollution as everyone will drive and make the clouds go all black and yucky.

My brother would like to say his thoughts on an email but he is only 1 and can't speak. I can read his thoughts though and he agrees with me. He would say, "build a few houses, not too many, as we like the open space and fresh air".

Please listen to what I say.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---
Comment ID: PSLPA16/3658  Respondent: 15614017 / David Ray  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a very frequent visitor to see my brother-in-law and his family who live in West Horsley, I am appalled at the proposals for future housing developments in the West and East Horsley parishes contained in the “Guildford Borough Proposed Submission Local Plan: Strategy and Sites – June 2016” (The Guildford Plan).

The proposal that you can increase the number of households by 35% is hard to comprehend particularly when there seems to have been little or no consideration in “The Guildford Plan” of the effect such a huge increase will undoubtedly have on the local infrastructure and services.

As a Surrey resident myself for over 10 years now, I understand the need for building more affordable housing in the County, but the proposals on the scale set out in the Plan are way in excess of quite frankly what is acceptable and sustainable.

In view of my observations set out above, I strongly object to the proposals set out in the “The Guildford Plan” and urge the Council to have a serious rethink about the numbers and sizes of developments proposed and come up with a much more realistic Plan in keeping with the local infrastructure, services and rural setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor
stretches from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
We would like this email to be taken as our objection to the Final Draft Local Plan, specifically the proposed development at Garlick's Arch, the 4-way interchange for the A3 at Burnt Common and taking Send out of the green belt.

Already, simply commuting from our residence in Sendmarsh to our places of work in Guildford and Cobham respectively on a daily basis, now proves to be unnecessarily prolonged and problematic. This is due to the blatantly obvious already excessive traffic encountered on roads such as the Sendmarsh Road or the larger Portsmouth Road. This clearly indicates that the road infrastructure is oversubscribed as a result of an already overpopulated area. Simply increasing the number of existing houses with proposed developments of an extra 400 houses along with increased industrial warehousing, will be disastrous for the villages of Send and Ripley. This would bring the certainty of gridlocked roads to this area. Currently we both have to leave for work over an hour earlier than we previously did five to ten years ago due to the increased traffic volume and resulting poor traffic flow that currently exists in this area.

Guildford Borough Council are already not investing enough money into the maintenance of the roads, leaving them in a terrible state. We are very concerned that increased traffic using these roads will mean they fall even further into disrepair. The local schools and doctors surgery are already oversubscribed - what will happen when there are so many more people trying to use these services?

We are also concerned about loosing the woodland around this area, which is what attracts many people to live and pay the high housing costs including the high rate of council tax in the first instance. Simply removing these villages from the green belt is detrimental to the standard of living in this area and is clearly only being proposed in order to open the flood gates for future land development that would only offer financial benefit for non-residents and the local authority.

We feel this level of development would change the area we live in unrecognisably and therefore would not be an area we would necessarily want to live in in the future.

We should be grateful if these objections and comments would be put before Inspector on this matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the ridiculous expansion of shopping areas in Guildford at the expense of housing. There are empty shops everywhere because people are shopping on-line and the trend can only continue. Retailers will only need a fraction of their previous shop frontage and certainly not more.

Meanwhile proposed houses are being forced out into the green belt where everyone will need a car and add to the near stationary commuting conditions. Young people like me want to live in cities. Times are changing and the Guildford plan doesn't seem to have caught up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15386</th>
<th>Respondent: 15614209 / John Finch</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I wish to register my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15390</th>
<th>Respondent: 15614241 / Jane Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15391  Respondent: 15614241 / Jane Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15388  Respondent: 15614241 / Jane Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by me as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological merit. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.
Further, on the erosion of Green Belt and I **object** that Policy P2 is not met where it states that Green Belt should be protected. I **object** to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

I **object** that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

I **object** to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

I **object** that housing being proposed on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15389  **Respondent:** 15614241 / Jane Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I **object** to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

Continuing with Policy S1 (Presumption in favour of Sustainable Development) I **object** that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15387  **Respondent:** 15614241 / Jane Smith  **Agent:**

---

Page 614 of 2988
I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am registering my objection to the local plan.

The reason for objecting are that the local roads, including the A3 and M25 are already too congested and the proposed development will add further to the current level of congestion and pollution. The smaller roads through West Clandon, Ripley and Send cannot cope with the increased level of traffic that such developments will bring.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3660</th>
<th>Respondent:</th>
<th>15614497 / Hannah Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:

- Amount of new housing far exceeds local need.
- Housing density excessive when compared with existing development.
- Would transform the Horsleys into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on Horsleys.
- Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.
- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
- Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
- Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6980</th>
<th>Respondent:</th>
<th>15614497 / Hannah Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):
• Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
• Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
• Unacceptable Conservative Party links between the developers and the Council.
• No Green Belt “exceptional circumstances” presented.
• Not a brownfield site as stated – only 15% of it.
• Proposed SCC waste site ignored.
• Loss of farming land.
• Too near RHS Wisley and Thames Basin Heath SPA.
• SANG would harm on SPA.
• Will aggravate traffic jams at A3 roundabout and M25 Junction 10.
• Unacceptable increase in air pollution.
• No existing public transport and stations miles away.
• No proper traffic data.
• Housing density far too great.
• Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
• Access confined to inadequate narrow lanes.
• Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
• Major impact on neighbouring villages, especially Horsleys.
• No assessment made of collective impact on area of this and 6 Horsley sites.

Hannah

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15418  Respondent: 15614497 / Hannah Yandle  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

I OBJECT TO POLICY D1 (BETTER PLACES):
• Poor monitoring.
• No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):
• Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):
• Supports over development: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and ‘Disneyfying’ public historic assets.
• Doesn’t ban development near historic assets.
• Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY D4 (SUSTAINABLE DESIGN ETC):

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)
• No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
• Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
• Objectives for inset villages cancelled out by plans for excessive housing growth there.
• Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15410  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I OBJECT TO POLICY E1 (EMPLOYMENT):
• Poor evidence base.
• Too much encouragement to low added-value employment that’s needed elsewhere in the country.
• Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
• Fails to differentiate this from appropriate rural business.
• Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15411  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):
• Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):
• Subordinates public planning policy to the University of Surrey’s private, commercial enterprises
  (not its public academic purpose).
• No cost/benefit analysis of harm to Green Belt involved in extending research park.
• Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY E5 (RURAL ECONOMY):
• Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
• Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining
  rural areas’ character.
• Towncentre uses for rural areas contradict government’s localism policy and need to consult and protect
  village environments.
• Established commitments to highspeed rural broadband and mobile coverage watered down despite 2014
  consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):
• Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
• No policy of opposing reduction in rural hotel capacity.
• No definition of what added value interventions by Council can make to normal visitor market mechanisms.
• No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
• No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15415</th>
<th>Respondent: 15614497 / Hannah Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E7 (TOWN CENTRE):
• No statement in policy wording of value of Guildford’s rural setting and views.
• No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
• Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
• No brownfield register.
• Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
• No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15416</th>
<th>Respondent: 15614497 / Hannah Yandle</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E8 (DISTRICT CENTRES):
• Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
• No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15417  Respondent: 15614497 / Hannah Yandle  Agent: 15614497 / Hannah Yandle

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E9 (LOCAL CENTRES):
• No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15403  Respondent: 15614497 / Hannah Yandle  Agent: 15614497 / Hannah Yandle

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 (HOMES FOR ALL):
• Policy doesn’t set any constraints on building.
• Housing mix based on preBrexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
• Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
• Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15404  Respondent: 15614497 / Hannah Yandle  Agent: 15614497 / Hannah Yandle
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
<tr>
<td><strong>I OBJECT TO POLICY H2 (AFFORDABLE HOMES):</strong></td>
</tr>
<tr>
<td>• Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.</td>
</tr>
<tr>
<td>• The viability clause lets developers off the hook of providing even these (non) affordable homes. Too open to manipulation.</td>
</tr>
<tr>
<td>• Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.</td>
</tr>
<tr>
<td>• This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15405  Respondent: 15614497 / Hannah Yandle  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</strong></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
<tr>
<td><strong>I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):</strong></td>
</tr>
<tr>
<td>• It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15422  Respondent: 15614497 / Hannah Yandle  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</strong></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
</tbody>
</table>
I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY)
• Infrastructure considered here as an afterthought, rather than precondition of development. Should be a key issue for the rest of the plan.
• Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
• Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
• Draft CIL scale discourages use of brownfield land first.
• No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging overdevelopment of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15423  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):
• Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
• Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented.
• Road plans too optimistic anyway, especially postBrexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15424  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):
• Just a list of generic measures, not related to real life or the particularities of Guildford.
• Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development.
• Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. I.e. most residents!
• Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15425  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):
• No teeth. Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15406  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P2 (GREEN BELT):
• No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
• No evaluation of value of local Green Belt as a public and private asset; it’s just treated as potential building land with a few inconvenient restrictions.
• Impact of Green Belt development on local agriculture ignored.
• Impact on rural leisure and tourism ignored.
• Impact on flood control ignored.
• Impact on carbon sink and knockon effects for air pollution and climate change ignored.
• Impact on biodiversity ignored.
• Impact on natural heritage ignored.
• Impact on water catchment ignored.
• Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
• Impact on rural business (e.g. mineral mining, film making) ignored.
• Impact on natural landmarks and views ignored.
• Harm to public health and wellbeing (physical, psychological) ignored.
• Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
• Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burdensharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15426  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:
• No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15407  Respondent: 15614497 / Hannah Yandle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):
• Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
• Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
• A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15408 Respondent: 15614497 / Hannah Yandle Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):
• Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15409 Respondent: 15614497 / Hannah Yandle Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):
• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT):
• No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No statement of how economic, social and environmental impacts should be balanced.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable development. No commitment to protecting it.
• No reference to most of the NPPF Core Planning Principles.

I OBJECT TO POLICY S2 (BOROUGHWIDE STRATEGY):
• Numbers based on growth and demographic data now invalidated by Brexit.
• No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
• 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
• Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
• High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3667  Respondent: 15614721 / Charles Leonard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Government's Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6981  Respondent: 15614721 / Charles Leonard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the creation of new north and south bound slip roads to and from the A3 to the A247 Clandon Road and Burnt Common (Policy No: A43A) - it is already impossible to drive into Guildford on any given afternoon from 16.00hrs onwards due to "sheer weight of traffic". The A3 to and from Guildford is already hugely over-used and any further increase in traffic would cause severe safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6988  Respondent: 15614721 / Charles Leonard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Another very serious matter that needs to be addressed is the fact that some of the proposed new sites are on land designated in the past as land which has been used as landfill and "refuse and slag-heap" land. This information has been collected from Ordnance Survey maps from the years 1963 to 1968. Surely to excavate these sites would, without doubt, bring severe health issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15456</th>
<th>Respondent: 15614721 / Charles Leonard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Other services in the local area are also inadequate for the number of homes and business which are already here - e.g. drainage, gas mains, electricity and water services.

Our schools are already over-crowded.

Our doctors surgeries are at "bursting -point". It takes several days to get to see a doctor at our local surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15448</th>
<th>Respondent: 15614721 / Charles Leonard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The infrastructure is totally inadequate for all of the associated new traffic which would inevitably come from the building of hundreds of new homes and, even worse, the planned industrial premises and factories and warehousing etc. We do not want articulated lorries speeding along our country lanes.

No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15435  Respondent: 15614721 / Charles Leonard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15455  Respondent: 15614721 / Charles Leonard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15427  Respondent: 15614721 / Charles Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.
The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15463  Respondent: 15614721 / Charles Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3666  Respondent: 15614753 / Anthony McCulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Government’s Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6982</th>
<th>Respondent: 15614753 / Anthony McCulloch</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the creation of new north and south bound slip roads to and from the A3 to the A247 Clandon Road and Burnt Common (Policy No: A43A) - it is already impossible to drive into Guildford on any given afternoon from 16.00hrs onwards due to "sheer weight of traffic". The A3 to and from Guildford is already hugely over-used and any further increase in traffic would cause severe safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6989</th>
<th>Respondent: 15614753 / Anthony McCulloch</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Another very serious matter that needs to be addressed is the fact that some of the proposed new sites are on land designated in the past as land which has been used as landfill and "refuse and slag-heap" land. This information has been collected from Ordnance Survey maps from the years 1963 to 1968. Surely to excavate these sites would, without doubt, bring severe health issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15447</th>
<th>Respondent: 15614753 / Anthony McCulloch</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The infrastructure is totally inadequate for all of the associated new traffic which would inevitably come from the building of hundreds of new homes and, even worse, the planned industrial premises and factories and warehousing etc. We do not want articulated lorries speeding along our country lanes.

No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15457  Respondent: 15614753 / Anthony McCulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Other services in the local area are also inadequate for the number of homes and business which are already here - e.g. drainage, gas mains, electricity and water services.

Our schools are already over-crowded.

Our doctors surgeries are at "bursting -point". It takes several days to get to see a doctor at our local surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15436  Respondent: 15614753 / Anthony McCulloch  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15454  Respondent: 15614753 / Anthony McCulloch  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15428  Respondent: 15614753 / Anthony McCulloch  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15464  Respondent: 15614753 / Anthony McCulloch  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3665  Respondent: 15614785 / Richard Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Government's Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6983  Respondent: 15614785 / Richard Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the creation of new north and south bound slip roads to and from the A3 to the A247 Clandon Road and Burnt Common (Policy No: A43A) - it is already impossible to drive into Guildford on any given afternoon from 16.00hrs onwards due to "sheer weight of traffic". The A3 to and from Guildford is already hugely over-used and any further increase in traffic would cause severe safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Another very serious matter that needs to be addressed is the fact that some of the proposed new sites are on land designated in the past as land which has been used as landfill and "refuse and slag-heaps" land. This information has been collected from Ordnance Survey maps from the years 1963 to 1968. Surely to excavate these sites would, without doubt, bring severe health issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The infrastructure is totally inadequate for all of the associated new traffic which would inevitably come from the building of hundreds of new homes and, even worse, the planned industrial premises and factories and warehousing etc. We do not want articulated lorries speeding along our country lanes.

No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Other services in the local area are also inadequate for the number of homes and business which are already here - e.g. drainage, gas mains, electricity and water services.

Our schools are already over-crowded.

Our doctors surgeries are at "bursting -point". It takes several days to get to see a doctor at our local surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15437  Respondent: 15614785 / Richard Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15453  Respondent: 15614785 / Richard Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15429  Respondent: 15614785 / Richard Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15465</th>
<th>Respondent: 15614785 / Richard Palmer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.
The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3664</th>
<th>Respondent: 15614817 / Jan Pearson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3664</th>
<th>Respondent: 15614817 / Jan Pearson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Government's Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4072</th>
<th>Respondent: 15614817 / Jan Pearson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.  

The Government's Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7621</th>
<th>Respondent: 15614817 / Jan Pearson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| I strongly object to the creation of new north and south bound slip roads to and from the A3 to the A247 Clandon Road and Burnt Common (Policy No: A43A) - it is already impossible to drive into Guildford on any given afternoon from 16.00hrs onwards due to "sheer weight of traffic". The A3 to and from Guildford is already hugely over-used and any further increase in traffic would cause severe safety issues.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6991</th>
<th>Respondent: 15614817 / Jan Pearson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Another very serious matter that needs to be addressed is the fact that some of the proposed new sites are on land designated in the past as land which has been used as landfill and "refuse and slag-heap" land. This information has been collected from Ordnance Survey maps from the years 1963 to 1968. Surely to excavate these sites would, without doubt, bring severe health issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

Another very serious matter that needs to be addressed is the fact that some of the proposed new sites are on land designated in the past as land which has been used as landfill and "refuse and slag-heap" land. This information has been collected from Ordnance Survey maps from the years 1963 to 1968. Surely to excavate these sites would, without doubt, bring severe health issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

Other services in the local area are also inadequate for the number of homes and business which are already here - e.g. drainage, gas mains, electricity and water services.

Our schools are already over-crowded.

Our doctors surgeries are at "bursting-point". It takes several days to get to see a doctor at our local surgeries.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
The infrastructure is totally inadequate for all of the associated new traffic which would inevitably come from the building of hundreds of new homes and, even worse, the planned industrial premises and factories and warehousing etc. We do not want articulated lorries speeding along our country lanes.

No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.

Other services in the local area are also inadequate for the number of homes and business which are already here - e.g. drainage, gas mains, electricity and water services.

Our schools are already over-crowded.

Our doctors surgeries are at "bursting -point". It takes several days to get to see a doctor at our local surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I write to register my strong objections to the new local plans for Surrey.

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15430  Respondent: 15614817 / Jan Pearson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15466  Respondent: 15614817 / Jan Pearson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1863  Respondent: 15614817 / Jan Pearson  Agent:
In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3663  **Respondent:** 15615233 / Gareth Nassh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Government's Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/6985  **Respondent:** 15615233 / Gareth Nassh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the creation of new north and south bound slip roads to and from the A3 to the A247 Clandon Road and Burnt Common (Policy No: A43A) - it is already impossible to drive into Guildford on any given afternoon from 16.00hrs onwards due to "sheer weight of traffic". The A3 to and from Guildford is already hugely over-used and any further increase in traffic would cause severe safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Another very serious matter that needs to be addressed is the fact that some of the proposed new sites are on land designated in the past as land which has been used as landfill and "refuse and slag-heap" land. This information has been collected from Ordnance Survey maps from the years 1963 to 1968. Surely to excavate these sites would, without doubt, bring severe health issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The infrastructure is totally inadequate for all of the associated new traffic which would inevitably come from the building of hundreds of new homes and, even worse, the planned industrial premises and factories and warehousing etc. We do not want articulated lorries speeding along our country lanes.

No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Other services in the local area are also inadequate for the number of homes and business which are already here - e.g. drainage, gas mains, electricity and water services.

Our schools are already over-crowded.

Our doctors surgeries are at "bursting point". It takes several days to get to see a doctor at our local surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15439  Respondent: 15615233 / Gareth Nassh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15451  Respondent: 15615233 / Gareth Nassh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15431</th>
<th>Respondent: 15615233 / Gareth Nassh</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15467</th>
<th>Respondent: 15615233 / Gareth Nassh</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3662</th>
<th>Respondent: 15615265 / Clive Pott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Government's Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6986</th>
<th>Respondent: 15615265 / Clive Pott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I strongly object to the creation of new north and south bound slip roads to and from the A3 to the A247 Clandon Road and Burnt Common (Policy No: A43A) - it is already impossible to drive into Guildford on any given afternoon from 16.00hrs onwards due to "sheer weight of traffic". The A3 to and from Guildford is already hugely over-used and any further increase in traffic would cause severe safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6993</th>
<th>Respondent: 15615265 / Clive Pott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Another very serious matter that needs to be addressed is the fact that some of the proposed new sites are on land designated in the past as land which has been used as landfill and "refuse and slag-heap" land. This information has been collected from Ordnance Survey maps from the years 1963 to 1968. Surely to excavate these sites would, without doubt, bring severe health issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The infrastructure is totally inadequate for all of the associated new traffic which would inevitably come from the building of hundreds of new homes and, even worse, the planned industrial premises and factories and warehousing etc. We do not want articulated lorries speeding along our country lanes.

No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Other services in the local area are also inadequate for the number of homes and business which are already here - e.g. drainage, gas mains, electricity and water services.

Our schools are already over-crowded.

Our doctors surgeries are at "bursting -point". It takes several days to get to see a doctor at our local surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/15440  Respondent: 15615265 / Clive Pott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15450  Respondent: 15615265 / Clive Pott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15432  Respondent: 15615265 / Clive Pott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15468  Respondent: 15615265 / Clive Pott  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3661  Respondent: 15615297 / Carole Butcher  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Government's Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4073  Respondent: 15615297 / Carole Butcher  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6987</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Government's Strategic Housing Market Assessment (SMHA) for proposed new housing in the area has been exceeded by some 70%.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7622</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I strongly object to the creation of new north and south bound slip roads to and from the A3 to the A247 Clandon Road and Burnt Common (Policy No: A43A) - it is already impossible to drive into Guildford on any given afternoon from 16.00hrs onwards due to &quot;sheer weight of traffic&quot;. The A3 to and from Guildford is already hugely over-used and any further increase in traffic would cause severe safety issues.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I strongly object to the creation of new north and south bound slip roads to and from the A3 to the A247 Clandon Road and Burnt Common (Policy No: A43A) - it is already impossible to drive into Guildford on any given afternoon from 16.00hrs onwards due to "sheer weight of traffic". The A3 to and from Guildford is already hugely over-used and any further increase in traffic would cause severe safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6994  Respondent: 15615297 / Carole Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Another very serious matter that needs to be addressed is the fact that some of the proposed new sites are on land designated in the past as land which has been used as landfill and "refuse and slag-heap" land. This information has been collected from Ordnance Survey maps from the years 1963 to 1968. Surely to excavate these sites would, without doubt, bring severe health issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7624  Respondent: 15615297 / Carole Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Another very serious matter that needs to be addressed is the fact that some of the proposed new sites are on land designated in the past as land which has been used as landfill and "refuse and slag-heap" land. This information has been collected from Ordnance Survey maps from the years 1963 to 1968. Surely to excavate these sites would, without doubt, bring severe health issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16918  Respondent: 15615297 / Carole Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

Other services in the local area are also inadequate for the number of homes and business which are already here - e.g. drainage, gas mains, electricity and water services.

Our schools are already over-crowded.

Our doctors surgeries are at "bursting -point". It takes several days to get to see a doctor at our local surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15442  Respondent: 15615297 / Carole Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The infrastructure is totally inadequate for all of the associated new traffic which would inevitably come from the building of hundreds of new homes and, even worse, the planned industrial premises and factories and warehousing etc. We do not want articulated lorries speeding along our country lanes.

No funding has been made available, nor has any funding been agreed by the Highways Agency for new roads and infrastructure. This fact came to light at a local plan consultation meeting at which Mr. Spooner of Guildford Borough Council was present, with a colleague, both of whom confirmed that there are, as yet, no plans in place by the Highways Agency for new roads in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15462  Respondent: 15615297 / Carole Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Other services in the local area are also inadequate for the number of homes and business which are already here - e.g. drainage, gas mains, electricity and water services.

Our schools are already over-crowded.

Our doctors surgeries are at "bursting-point". It takes several days to get to see a doctor at our local surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Answer (if comment is on questions 1-7 of the questionnaire): ()

These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to register my strong objections to the new local plans for Surrey.

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

These proposed new local plans are on areas of designated green-belt land which holds permanent green-belt status.

Our green-belt land is home to a very large number of flora, fauna and wildlife, including some very rare bird species, all of which would be lost forever if these new proposed plans were to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15449  Respondent: 15615297 / Carole Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Already, with no additional building, we are constantly flooded (even in the months of June and July 2016), as the drainage in the area is inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15433  Respondent: 15615297 / Carole Butcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.

The proposed sites are neither adequate nor viable for building in such a huge capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15434</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the sites in the Horsleys, Send, Clandon, Ripley and all surrounding areas.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed sites are neither adequate nor viable for building in such a huge capacity.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15469</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16916</th>
<th>Respondent: 15615297 / Carole Butcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The infrastructure is totally inadequate for all of the associated new traffic which would inevitably come from the building of hundreds of new homes and, even worse, the planned industrial premises and factories and warehousing etc. We do not want articulated lorries speeding along our country lanes.

The roads approaching the A3/M25 Junctions are already gridlocked and could therefore not possibly cope with any additional traffic, obviously.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** SQLP16/1864  **Respondent:** 15615297 / Carole Butcher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

In conclusion, it would appear the it is the firm intention of Guildford Borough Council to join up Guildford and Woking as major industrial centres, and in the process of doing so they will be losing the identities of our villages!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPA16/4553  **Respondent:** 15615489 / Alison Bullman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Roads and Transport**

- The rail station car park is full during the week/working hours. If the village population were to increase, how would the car park/station facilities cope with the added strain? This also applied to the traffic movements to/from Horsley station to drop off/collect travellers, commuters and school children.
- Traffic generated from the proposed new development will be significant, given most households have on average 2 cars.
- Journey times will increase significantly on local roads, with jams exiting the A3 and A24 and through the villages.
The roads are already in a terrible state in terms of potholes. Added traffic will make this far worse.
I have huge concerns for safety as I am already too afraid to walk my daughter to and from school as pavements are often too narrow to get my son’s buggy down, cars drive too fast and in the winter months it is too dark due to no street lights.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15470  Respondent: 15615489 / Alison Bullman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools

• There is a significant lack of state primary school places in the village. Living less than 2 miles from The Raleigh School, we were unsuccessful in initially securing a place for our daughter in Reception. We were allocated Clandon CoFE. One of the reasons we moved to West Horsley, was for our children to attend the local village school, so we were shocked and saddened to face the reality of educating our child in another area. The Raleigh - which serves children from West and East Horsley - has been full every year for many years. I believe it is already a large village school with over 400 students. New families moving into the area would face a worse situation that us currently. I believe it would be detrimental to the education of our children for the school to increase in size and it clearly cannot cope with any more families in the local area applying for places.

• Howard of Effingham secondary school places are already limited and other secondary schools mean much longer commutes (in terms of both time and distance) from West Horsley village. The proposed increase in housing in West Horsley (and East Horsley) simply does not address the already acute shortage of local school places for existing residents/housing.

• Glenesk and Cranmore private schools situation in East and West Horsley are also at or very near full capacity each year. There is already a high volume of traffic to and from each school twice a day on Ockham Road North and the A246 respectively, from families that live outside of the area. This traffic added to the additional traffic as a result of the new housing, would result in gridlock.

Medical facilities

• Whilst we live in West Horsley, we can’t even use the local Medical Centre and have to travel to The Villagers Medical Centre in Send. Kingston Avenue Medical Centre in East Horsley already can’t serve existing local residents such as ourselves. Only a possible extension to Kingston Avenue is mentioned, it doesn’t sound sufficient given the existing situation.

• The planned population increase for the Borough (in excess of Government ONS forecasts) will require a major extension of the Royal Surrey Hospital to cope. Again, I know the hospital is fit to burst and has had requests for additional parking and amendments to the exit/entrance to the A3 denied.

Waste Water Infrastructure
• Roads surrounding West Horsley, leading into the village centre/towards school/station etc, regularly floods (at least 3 times a year). The road to Ripley (Ripley Lane/Rose Lane) also floods on a regular basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15473  Respondent: 15615489 / Alison Bullman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy i3 - Sustainable Transport for new developments

• The proposed policy is unrealistic and lacking clarity or credibility in it’s wording regarding developers proposing and securing travel plans for their developments and contributing to transport arrangements for both the able and disabled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15472  Respondent: 15615489 / Alison Bullman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1 - Presumption in favour of Sustainable Development, Policy S2 - Borough Wide Strategy, Policies H1&H2 - Homes for all & Affordable Homes

• Policy S2 states provision will be made for 13,800 new homes over the Plan Period 2013 - 2033. The number of homes it too high and unsustainable for Guildford’s villages. The Site Allocations list totals 12, 698

• West Horsley village expansion would be unsustainable for the proposed high number of new houses - we already have very limited local services (no post office, one small shop which is rumoured to be closing, barely any nearby parking, limited bus services)
• The proposed development of 385 homes on 4 proposed sites are at much higher densities than currently exist in the village - they will be out of character with existing densities and existing mix of housing styles. They won’t fit the village.

• The homes building proposals will not be sustainable in terms of roads capacity, shops, parking, schooling, drainage, parking in East Horsley (station and shops), or public transport.

• No proof has been put forward for why so many homes need to be built in West Horsley over the first 5 years of the plan period 2018 - 2033. In fact, The West Horsley Parish Council and Surrey Community Action Housing Survey : May 2014 identified a limited need for approximately 20 affordable homes for local people who want to remain in the village (young people and elderly downsizers).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15471  Respondent: 15615489 / Alison Bullman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In reference to: Policy P2 - Green Belt and the Countryside, and Policy P1 - Surrey Hills Area of Outstanding Natural Beauty (AONB)

• The changes are unreasonable and will change the look, feel and environment of our village forever.

The proposed plan is not in-line with continuing to “protect the Metropolitan Green Belt against inappropriate development”

• I am opposed to West Horsley village being removed from the Green Belt by insetting and expanding the 2003 Local Plan Settlement Area boundaries. No justification is given, exceptional circumstance or otherwise, for the New Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt.

• The Green Belt and Countryside Study is flawed

• West Horsley’s current Settlement Area boundaries (ref 2003 Local Plan) do not need extending

• West Horsley receives a significant number of recreational visitors (including cyclists, and walkers) throughout the year. This is due to the current housing density settlements, variety of historic buildings and position on the north side of the North Downs, partly in the Surrey Hills AONB. The proposed plan would negatively affect the enjoyment gained by these visitors.

• The Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031 does not make any case for locating large numbers of homes in West and East Horsley or neighbouring villages. In fact, the proposed new economic development site proposals are on the opposite side of the Borough to West Horsley!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3669</th>
<th>Respondent: 15615745 / Nicholas Thompson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. **I OBJECT to the proposed Infrastructure Schedule (Appendix C)**
   
The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and does not therefore seem to have been properly considered or constructed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3668</th>
<th>Respondent: 15615745 / Nicholas Thompson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. **I OBJECT to the strategic sites proposed in the draft Plan to be built in the Green Belt.**
   
   1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
   
   2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the
previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that the Council was required to give proper consideration to constraints. I also believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
   ◦ The “objectively assessed need” figure of 693 homes a year is too high.
   ◦ A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   ◦ The current SHMA inflates the proposed housing figure due to
     • failure to correct for errors in the historical data for international migration flows,
     • issues with the way it considers students and affordability and
     • flaws in the method for estimating the number of homes needed to support job growth.
   ◦ It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/6995  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarns Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near Shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 30 6 2016 Motorcyclists with injuries airlifted to hospital  Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow,
winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6996  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch. As a member of the Woodland Trust and someone with a deep concern for the environment at a local and a global level, I object vehemently to the likely damage to Ancient Woodland.

The site cannot possibly be considered as sustainable in any real sense, being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

This site is bordered by Ancient Woodland and within a number of trees are protected by Tree Preservation Orders (Policy D3). The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15490</th>
<th>Respondent: 15615745 / Nicholas Thompson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT particularly strongly to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I ALSO OBJECT particularly strongly to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15491</th>
<th>Respondent: 15615745 / Nicholas Thompson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to Policy D3 - Historic environment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15482  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15483  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15493  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15489  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15487  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area.

Please note, however, that I support policy H1 as regards travellers’ sites. This strikes me as sensible and I believe that other objectors are influenced by negative prejudices about travellers as people rather than an objective and considered response to the development and planning issues involved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID:  PSLPP16/15488  Respondent:  15615745 / Nicholas Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/15492  **Respondent:** 15615745 / Nicholas Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy H3 – Rural Exception Homes, as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15485  **Respondent:** 15615745 / Nicholas Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.

Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and
suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/15486  **Respondent:** 15615745 / Nicholas Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/15480  **Respondent:** 15615745 / Nicholas Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

I do not see a justification for the apparently exceptional circumstances that might justify amendment of Green Belt boundaries.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that the consultation process be restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15479  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. It seems to be that virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.
This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the area around my village of East Clandon.

I specifically do not accept that the strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in any way sustainable. Wisley will just lead to a large increase in traffic on the A3, and the first two sites do not have railway stations. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15494  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my strong objection to the draft local plan and in particular its approach to the concept of sustainable development. In my opinion the plan's definition of what is sustainable is miles away from any reasonable interpretation of the term.

Attached is a more detailed response.

I have no doubt that you will have received many similar ones, written with encouragement of protest groups. Given the huge size of the document, the complexities involved, and how busy people's lives are these days, that is hardly surprising. But I would urge you strongly not to try to dismiss my, or anyone else's, response on those grounds. I have taken a great deal of time to read through the suggested submissions in detail, have many numerous changes to them to reflect my particular concerns and have removed sections that I do not agree with.

Please note, for example, that contrary to other objectors, I support policy H1 as regards travellers' sites. The proposal strikes me as sensible and I believe that other objectors are influenced by negative prejudices about travellers as people rather than a properly considered response to the development and planning issues that are involved.

I would urge you to bear this explanation in mind when dealing with my remaining objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1722  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1723  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1724  Respondent: 15615745 / Nicholas Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1725  Respondent: 15615745 / Nicholas Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7002  Respondent: 15616065 / Alex Harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident I strongly object to the Proposals for Blackwell Farm development (policy no A26) and the proposal to build a road from the A31 to the Tesco roundabout.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7012  Respondent: 15616065 / Alex Harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

**Objection to Blackwell Farm Development/Normandy**

The impact on Wanborough from such a large numbers of houses, commercial, retail and community uses such as schools etc. is cause for concern as to how the surrounding area will cope. The current infrastructure around Wanborough is creaking and this would introduce a high level of new traffic into probably the most congested part of the county. The current drawings do not give details of any major transport improvements but it is identified within the local plan that this will be an issue. It would be reassuring to have some clear plan as to what this might look like but at this stage it is no more than speculation.

The requirement for this amount of homes is based on the SHMA which assess the housing need going forwards and these figures are disputed, however if we assume that the numbers are correct the plan to provide such large numbers of homes in one place will put a heavy burden on a small area, though the two sites are not directly connected the large housing increase suggested for Normandy village would presumably see a very marked increase in traffic traveling through Wanborough to get to the main trunk routes of the A31 and A3. Development within villages in the Green Belt is supposed to be limited to small scale infilling, which Normandy is definitely not.

In the local plan there are some clear statements as to the type and mix of houses to be provided, on any development of 5 or more homes, or sites of 0.17 ha regardless of number of homes, 40% of all homes on the sites must be affordable homes and developers will be expected to provide land for affordable homes at nil value.

It is stated that permission will not be granted for developments that would result in net loss of any affordable homes that were secured by planning obligation or condition. This provision is based on the fact that it has been assessed that 50% of all households over the plan period will not be able to buy or rent homes without assistance.

Developers will be required to meet the costs of affordable housing and are expected to take this into account when agreeing the price paid for the site. This will mean that the 60% of houses built for Market Homes will need to cover this cost making them ever more expensive and out of reach of many local people.

**Blackwell Farm Type and Mix**

No indication is given for the what will actually be built, however the council has given an assessment of the demographic between affordable and market homes which fall into two categories:-

Affordable homes - there is a need for 40% one bed, 30% two bed, 25% three bed and 5% 4 bed. This would lead you to believe that the affordable need is not in family homes with 70% of the housing being one and two bed.

Market Homes - there is a need for 10% one bed, 30% two bed, 40% three bed and 20% four bed. This would lead you to believe that there is greater need for family homes with 60% of the housing being three and four bed

Blackwell Farm - mixed used development 1800 homes (Based on the split above)

Affordable 720 – 288 one bed, 216 two bed, 180 three bed, 36 four bed.

Market Homes 1080 – 108 one bed, 324 two bed, 432 three bed, 216 four bed

Total 1800 – 396 one bed, 540 two bed, 612 three bed, 252 four bed

The very high levels of one and two bed within the affordable sector could be due to the projected high levels of student accommodation that will be needed if the university continues to grow, Surrey University should be responsible for housing any increase in student numbers on its own campus. It should not be taking away lower cost accommodation stock from local people.
The increase in housing at both the ends of the parish boundary will have an effect on the people living within Wanborough. How detrimental this will actually be depends on how well thought out the infrastructure plan is, GBC/SCC/Highways record in this area over the last few years has been poor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3675</th>
<th>Respondent: 15616161 / Anna Joyce</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the proposed local plans and do not agree with the scale at which Guildford Borough Council is planning to build.

I was born and raised in West Horsley, and attended The Raleigh and Howard of Effingham schools. My greatest joy is seeing how the villages and local area have continued to thrive while still maintaining their natural beauty, green space and historical integrity.

Having said this, the Horsleys are at capacity with regards to certain facilities and have been for a number of years. Namely, the train station carpark, doctors surgery, parking at local shops and schools. The proposed plans to increase the housing in this area are ludicrous if there is inadequate infrastructure to support this growth. The only primary school in the village will not be able to cope with the proposed 150 additional children as it is already at capacity. The proposals do not suggest how this will be dealt with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7008</th>
<th>Respondent: 15616161 / Anna Joyce</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I also object to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which I do not believe to be accurate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15517  Respondent: 15616161 / Anna Joyce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I would like to highlight that some parts of the villages are already in disrepair as a result of current usage (roads, pavements, drains) and I do not see how these will be improved with the addition of hundreds more houses in the immediate area. This must be recognised and addressed. There is frequent flooding on the roads from blocked drains and the roads are very dangerous at certain points due to being narrow and without road markings.

In conclusion, I understand the need for future development and forward planning for the area but the proposed plans are too wide-ranging, too large and do not adequately take into account how existing infrastructure will cope. I wholeheartedly believe the proposed plans will have a detrimental impact on what I consider to be two of the most beautiful and historically important villages the country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7009  Respondent: 15616225 / Rachel Lane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to OBJECT to the above proposal.

The need for a school

I cannot find any exceptional evidence to prove the need for a secondary school.

Even if Normandy was extended by 175%, the number of pupils at such a school who actually come from Normandy would be around 12% - and that is on the assumption that new housing is taken up by families with school children (and not the older, retired ABC1s and downsizers who typify this area). This means a massive 88% / 1320 pupils would have to
commute in from other areas not less than 2.8 miles away to over 6 miles away. It is my opinion that a school should be located closest to wherever the majority of its pupils live. This is also reflected in the usual admissions criteria, where pupils are admitted on an “as the crow flies” shortest distance to their homes. Wherever possible the school commute should be in safe walking or cycling distance for the majority of pupils.

I have carefully reviewed all the surrounding schools in the areas of Guildford, Ash, Tongham and Blackwell Farm – their intake, capacity to extend and most importantly, the distances of each “as the crow flies” the shortest distance to pupils’ homes being the key admissions criteria, vs. the site at Normandy. For test purposes I took at central postcode on Glaziers Lane and Central / High street postcode in the areas reviewed.

Key findings include:

1. Families already have a choice of 2 to 4 or more schools in each of the areas, where at least 2 secondary schools are within 1.5 miles of the central postcode of each area. By comparison the distance to the site at Normandy is 2.8 miles or more.
2. almost 85% of existing surrounding schools within each area are undersubscribed; one is only at 43% capacity and has 511 spaces. As such the opening of a school at Normandy would be detrimental to the intake and sustainability of these schools and in turn, itself.
3. 45% of all schools are already extending or have the capacity to extend further. As birthrates in the area continue to fall, and home schooling continues to rise, it would be foolish to build another school until there is an actual proven need. It would be a better use of money and ultimately to the respective communities to proceed with caution and extend the existing schools, should the requirement present itself.
4. Almost 18% of schools reviewed are new and will provide 1320 additional spaces by 2018.

**The impact of a school**

A secondary school in Normandy would be detrimental to the sustainability of existing schools as the majority are undersubscribed.

A secondary school at site A46 can only be accessed by road or train. There are no safe cycle or walking routes due to the speed and narrowness of the highways, many have no pavements either given the rural location.

**Where will the bulk of pupils come from?**

Tongham, 4.4 miles away from site A46. There is no train station. Pupils will have to be driven via the severely gridlocked A31 Hogs Back

Blackwell Farm 4.7 miles away from site A46 - there is no train station. Pupils will have to be driven via the gridlocked A31 Hogs Back.

Guildford – pupils can get the train if they live in the town centre but if they are North Guildford they will need to be driven via the heavily congested A323 Guildford Road or dropped into Guildford town centre, which would exacerbate the already severe congestion at Guildford station gyratory. (N.B your proposal to increase train services on the Guildford to Aldershot line will also further impede the flow of traffic on the A323, since a cause of the long queues is the level crossing at Ash). Driving to and from Guildford town centre on a school run would not become costly and unsustainable for many – a round trip journey from Guildford to Normandy and back takes around 1.5 hours or more at peak time via the Hogs Back.

Ash – 2.8 miles away from site A46 – pupils can get the train if they are in walking distance however it is likely many would be driven further exacerbating traffic issues on the A323 Guildford Road which was identified in OGSTAR (Options Growth Scenarios Transport Assessment Report) study as being at full capacity already, without the addition of a couple of thousand more cars at peak time.

**The existing highways infrastructure**

Site A46 is surrounded on each side by -
Glaziers Lane; a mile long D60 unclassified country road which is a corridor (no roads off it) with few pavements and low intermittent street lighting (as it is a rural area). Westwood Lane; a C16 country road with a small angled railway bridge and blind spot which reduces traffic to single file. There are few pavements and little or no street lighting too. These roads see many accidents with vehicles leaving the road in many cases. Increasing the traffic on these will result in many more accidents and fatalities.

These roads were not built to support the weight of traffic they are now taking, let alone further dramatic increases. Drains in these roads have collapsed under the weight of traffic - indeed Clancy Dowcra confirmed to me the drains under the road outside my property have collapsed again during their site visit Monday 20/6/16. Both Glaziers Lane and Westwood Lane suffers from flooding and drainage issues, including site A46. It is fair to say substantial, ongoing costly remedial works to highways will be required to the immediate roads to support the extra 4000+ cars at peak time which will be hugely disruptive to the village and site.

Westwood Lane/ Glaziers Lane through Flexford Lane continues through Wanborough through an area of outstanding Natural Beauty to Wanborough Hill, where queuing traffic waits to exit onto Puttenham Hill/Puttenham Heath Rd to connect to the heavily congested A31 Hogs Back and A3 at Compton. At the other end it exits onto the A323 Guildford Road.

The secondary school will bring in around 2000 cars to these roads, trying to enter and exit within 30 minutes. This will result in long queues and absolute access and exit chaos at school run times. I have attached photos whilst sat in static traffic queues which we already endure on a daily basis.

This development does not have the highways infrastructure to support it and there is no significant opportunity to improve it further. I would like to take this opportunity to remind planners that there has been no significant highways improvements in this area for the past 30 years with no budget for further work.

Given the evidence in this letter and additionally, the data in my objection email to Councillors dated 11.05.16 I am forwarding with this letter, the proposed development at site A46 is clearly not an ‘enabling development’. There are alternative sites which are better suited to development without the associated highways cost and sacrifice of highest grade green belt land eg. behind the pub on the Guildford Road and at Rokers by Fairlands. Thorough research must be undertaken.

Finally, the development itself. Taylor Wimpey build cheap & cheerful houses and retail parks. They never build schools. They will sub contract this out to another developer and this will cost more. The plan for an ‘estate’ of Taylor Wimpey homes would not be in keeping with the rest of the village – where houses all differ and have grown organically. If any development must happen, properties must be sympathetic to the area and in far less numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the proposals for Blackwell Farm development (policy no A26) and the proposal to build a road from the A31 to the Tesco roundabout.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3679  Respondent: 15616449 / Monica Heilpern  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

We would like to put forward our strong objection to the Guildford Council proposal for the area of Horsley for being so ferociously drastic when it could easily be preparing a softer solution, better use of brownfield around Guildford area, respecting the importance of the Green Belt in Horsley and it surrounding villages. Current infrastructure cannot cope with the Council’s proposal. Amongst other reasons are the following:

The impact of the proposals on East & West Horsley:
- proposal to remove East & West Horsley out of the Green Belt (along with many other Surrey villages)
- 385 new homes in West Horsley (a 35% increase on the existing housing number - the highest increase of all Guildford villages)
- a 25% increase in housing across the borough against official growth projections of 15%
- a lack of supporting infrastructure (schools, Medical facilities, parking spaces etc) to accompany plans for extra housing in the area)

GBC’s proposal will be absolutely detrimental to Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3680  Respondent: 15616513 / Sarah Harrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Send village being removed from the green belt. Send provides an essential "gap" or buffer stopping Guildford and Woking becoming one continuous urban area. If Send were removed developers would be quick to take advantage without protection of the green belt.

I object to 45 houses being built at Cockburn nursery. The road infrastructure cannot cope with this volume of additional traffic associated with this level of development. Tannery Lane is just that a Lane, twisty and narrow. There is also a very hazardous junction to Send Road.

I object to building 400 houses and 7000sq metres of industrial space at garlick's arch. Send simply could not support such an increase in housing. The site often floods and I believe this is an area of ancient woodland.

I object to the development of 40 houses and 2 travellers pitches at send hill. The access is via a narrow single land road which is insufficient.

I would be grateful if my comments were shown to the planning inspector and please send confirmation of receipt of this communication.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I would like to register my objection to the Guildford Borough Council local plan and in particular the removal of Horsley from the green belt.

The assessment of the Horsley's within the local plan seems flawed and does not reflect the reality of life in this village.

The Horsley's are primarily a rural community with low population and housing density which add to the open nature of the green belt area within which it is situated.

There is a lot of talk about increasing commercial centres and leisure facilities within the area but I and my neighbours would argue that the leisure facilities that we enjoy are bought about by the rural nature of the village and the ability to walk, cycle, run within the countryside which immediately adjoins our village. The Horsley's benefit from a parade of shops which are supported by the immediate community and not by a larger and wider community as the report would suggest. If this was indeed the case then I am sure that the number of banks would not have dwindled from three of recent years to a sole existing bank. This commercial centre exists because of the affluence of the local community and their willingness and desire to support their local community. We live in a village and want to support our local companies and not be turned into a district centre with high rates where the retail environment only supports national and international chains.

As a predominately small rural village the Horsley's are served by a number of small country lanes highly unsuited to the increased housing and therefore traffic that the new local plan demands.
The area is regularly affected by both flash flooding and longer term floods during the winter months when the main road that serves the village and which would serve the proposed 1000 plus cars suffers severe flooding.

The large number of proposed building sites are compounded by the major new towns that are proposed within five miles of the village boundary. Schools are full and unable to obtain planning permission to rebuild. Rebuilds that are only able to be financed through private financing initiatives with residential developers for more housing alongside the already oversubscribed school. Train stations whose car parks are already full to capacity with nowhere but greenbelt to expand into.

With developments such as the Wisley airfield no doubt being sold on their proximity to the A3, has anyone involved in the compilation of this report ever tried to travel between Wisley and Guildford on the A3 any time after four pm when a twelve minute journey will take in excess of forty five minutes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/3684  **Respondent:** 15616737 / David Freeman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

As a long term resident of the Horsley area for over twenty years I would be grateful if you could note my objection to the Local Plan that is being considered for Guildford, and in particular, in relation to its likely impact on West and East Horsley.

I appreciate there is a housing crisis, and that new housing must be built somewhere. However, I would argue that the building of any new housing should be undertaken in a way that that is sympathetic to the tone, style and atmosphere of the villages (West and East Horsley) today. I would argue that increasing the housing stock in West Horsley by 35% will result in a significant change in the village and it represents putting the interests of the future occupiers of the new properties ahead of those who already live there. However, I also appreciate there has to be a balance. There will have to be some development – but increasing the housing stock by 35%, a percentage that is not repeated in other villages, is neither fair, not appropriate.

However an even greater concern is the lack of infrastructure planning in the proposed local plan. It is well known that all local services in the Horsleys are under pressure, some at breaking point, and the failure to provide for water, sewage, schools and medical facilities at a level that can provide the required services for an increased population, will increase pressure on the that population, and perhaps, although I hope not, social tensions.

There will be a significant increase in traffic, and the local roads are already under pressure, and the transport infrastructure is failing the current local population.

However my biggest concern is the proposal whereby the Horsleys will, if I understand the draft plan correctly, fall outside the Green Belt, if the plan is adopted. This insetting will create a dangerous precedent – and could lead to the loss of further facilities and change the environment of the area beyond recognition.

At a time when the political process is the subject of such scrutiny, and people are becoming increasingly focused on asserting their concerns through the medium of local democracy, it has to be hoped that the opinions of those who actually
live in the Horsleys today, and whose lives will be most affected by the adoption such a plan, will be considered and given due weight.

I am not suggesting that the should be no development – just that an increase in the housing numbers in West Horsley by 35% is excessive and inappropriate, and that my concern is exacerbated by the apparent failure to provide infrastructure for the additional people who will occupy those houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7021</th>
<th>Respondent: 15616929 / Nigel Wickham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7020</th>
<th>Respondent: 15616929 / Nigel Wickham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15547</th>
<th>Respondent: 15616929 / Nigel Wickham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15549  Respondent: 15616929 / Nigel Wickham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15544  Respondent: 15616929 / Nigel Wickham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**I object to the lack of proper infrastructure planning for sites (Policy I1)**

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)**

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

** Attached documents:**

---

** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

** Attached documents:**

---

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years.

** What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

** Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15542</th>
<th>Respondent: 15616929 / Nigel Wickham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>** I object to the local plan as the development proposed is not sustainable (Policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15546</th>
<th>Respondent: 15616929 / Nigel Wickham</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>** I object to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3698</th>
<th>Respondent: 15617185 / Michelle Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
** I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3697</th>
<th>Respondent: 15617185 / Michelle Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7031</th>
<th>Respondent: 15617185 / Michelle Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7030</th>
<th>Respondent: 15617185 / Michelle Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15594  Respondent: 15617185 / Michelle Mitchell  Agent: |
|-----------------------------|---------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15596  Respondent: 15617185 / Michelle Mitchell  Agent: |
|-----------------------------|---------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15591</th>
<th>Respondent: 15617185 / Michelle Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15597</th>
<th>Respondent: 15617185 / Michelle Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15598 | Respondent: 15617185 / Michelle Mitchell | Agent: |
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15595  Respondent: 15617185 / Michelle Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

** I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15590  Respondent: 15617185 / Michelle Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
** I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15592  Respondent: 15617185 / Michelle Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15589  Respondent: 15617185 / Michelle Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

** I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15593</th>
<th>Respondent: 15617185 / Michelle Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>** I object to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3704</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the proposed Infrastructure Schedule (Appendix C)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Comment ID: PSLPA16/3703 | Respondent: 15618305 / Lawrence Claridge | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7035  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7037</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15628  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15642  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15644  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15622  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15624  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15626  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15647  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists, To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15640</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15636</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15638  Respondent: 15618305 / Lawrence Claridge  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of...
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when
developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location
close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount
of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now
having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the
original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15645  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere
near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village
connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve
the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large
executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that
cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including
the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As
drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm
to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy
wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire
available.) The policy should include the need for a balancing exercise including consideration whether more suitable
locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values,
leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will
be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left
undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15630  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15632</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &amp; M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15634</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to poor air quality concerns (Policy I3)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Comment ID:** PSLPP16/15618  **Respondent:** 15618305 / Lawrence Claridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15614</th>
<th>Respondent: 15618305 / Lawrence Claridge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15616  Respondent: 15618305 / Lawrence Claridge  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1729  Respondent: 15618305 / Lawrence Claridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1731</th>
<th>Respondent:</th>
<th>15618305 / Lawrence Claridge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1735  **Respondent:** 15618305 / Lawrence Claridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3705  Respondent: 15618337 / Matthew Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially
confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7036  Respondent: 15618337 / Matthew Pitt  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

   • Clandon Cross Roads Area to Bulls Head - 17 incidents
   • Bulls Heads Head to Bennett Way - 8 incidents
   • Bennett Way to Highcotts Lane - 15 incidents
   • Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

   • 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/7038  **Respondent:** 15618337 / Matthew Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15627  Respondent: 15618337 / Matthew Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15641  Respondent: 15618337 / Matthew Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.
The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15623</th>
<th>Respondent: 15618337 / Matthew Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15625</th>
<th>Respondent: 15618337 / Matthew Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15648  Respondent: 15618337 / Matthew Pitt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment“/Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15639  Respondent: 15618337 / Matthew Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15635  Respondent: 15618337 / Matthew Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15637  Respondent: 15618337 / Matthew Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of...
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15646</th>
<th>Respondent: 15618337 / Matthew Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15629  **Respondent:** 15618337 / Matthew Pitt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15631</th>
<th>Respondent: 15618337 / Matthew Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15633</th>
<th>Respondent: 15618337 / Matthew Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process, many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15619  Respondent: 15618337 / Matthew Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15613</th>
<th>Respondent:</th>
<th>15618337 / Matthew Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( )
| is Sound? | ( )
| is Legally Compliant? | ( )
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15615  Respondent: 15618337 / Matthew Pitt  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1728  Respondent: 15618337 / Matthew Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1730</th>
<th>Respondent:</th>
<th>15618337 / Matthew Pitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1734  Respondent: 15618337 / Matthew Pitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of West Horsley I would like to strongly object to the proposed plan to build additional houses on the green belt in and around Horsley

The character of the village would be totally changed and the village and residents would be completely affected.

There are other possible alternatives and options available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I wish to object to the draft Local Plan in the strongest possible terms, for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored and this simply appears to put money in the pockets of overseas investors rather than doing something useful with land that needs regeneration rather than conservation as the greenbelt does.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. Where has this number come from. They should not be used without complete clarity and transparency.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to

FWA/TFM, an area that at present has only 0.3% of the population of GBC). This does not equate to a reasonable and fair
process of distributing new housing.

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, there are remaining about the future housing requirement figures, with a risk that entire Guildford Plan is based on exaggerated forecasts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7041</th>
<th>Respondent: 15618561 / Howard Klein</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically in respect of Gosden Hill - The population of Burpham is c5,000, including a number of new housing areas; but adding a further 2,000 homes will destroy the sense of the environment.

On a personal note - Merrow Lane north of the railway bridge (to the corner near the A3) is an important part of our countryside, which will be destroyed – for cyclists and walkers alike.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7040</th>
<th>Respondent: 15618561 / Howard Klein</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A7</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically, the current plan for Guildford Station is an awful “eyesore”, which is out of character for the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The plans are incomplete in respect of the necessary infrastructure:

1. Schooling, at all levels;
2. Healthcare, in all its forms;
3. Transportation has not been thought through adequately. Deferring to a later assessment, or just awaiting the unintended consequences, will not do.
   1. Redesigning Burpham junction to allow A3 Southbound access/exit, even with unconfirmed reports to widen the A3 through Guildford, will have unforeseen consequences on traffic flows across the area.
   2. Similarly, while noting the 2 extra stations, I do not believe that the full impact of these has been considered. For example, it is as if Merrow East will serve Gosden Hill, but the new station will draw in other traffic, which will disrupt the local area if not adequately considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

There are already increasing concerns regarding parking in the centres of both Burpham and Merrow, both will become exacerbated with new developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The plans encroach into the Green Belt to an unacceptable degree whereby the beautiful environment of Surrey will be devalued immeasurably: towns get bigger, villages appear to merge and we end with endless conurbations which lose the vital “breathing space”.

1. Some existing villages, e.g. Ripley, will be affected will be irreversibly damaged; and
2. Huge new settlements, such as Gosden Hill (see below) will destroy vitally important space around Guildford.

I note promotional content that “our most important countryside, landscapes, and heritage” (per http://www.guildford.gov.uk/newlocalplan/) should be protected, but there are so many aspects to be considered. And while I may not be an expert, nor have the time to scrutinise all the documentation, I note, for example, that of the GBCS 2012 identified villages (Chilworth, East Horsley, Effingham, Fairlands, Flexford, Gomshall, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/Burnt Common, Shalford, Shere, West Horsley and Wood Street Village) just 2 are excluded. It appears that the residents of the remainder have to suffer the butt of the Plan.

I missed seeing the impact of separate plans to build further homes on the Clandon Estate, removing it from the Green Belt; turning the GBCS “on its head” (Source: MRA). This adds significant housing to the existing population of 8,000/3,500(?) homes, which includes Merrow Park. I am unsure how this extra development fits into satisfying the housing assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15652  Respondent: 15618561 / Howard Klein  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Councils must do more to demonstrate they have explored existing brownfield sites, with a greater willingness to change usage requirements in order to allow more smaller developments – particularly for important low-cost housing. Just think of the aggregate number of units which could have been built over the past 5 years if a “big picture” approach been taken.

With more time, and/or in co-operation with others, one could continue this list. Please note that this is not a case of “nimbyism”, especially given I have lived in Merrow Park - the last great expansion in Merrow – for 30 years. However, I see severe shortcomings but in the plan and, for the sake of the future of the community, I am not supportive to allowing the town and its environs to be adversely affected in the manner proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1736  Respondent: 15618561 / Howard Klein  Agent:
In my opinion, this is an extensive plan which deserves a concise review by some form of qualified panel which is not funded by the Council; thereby giving a reasonable opportunity to rebut, in a qualified/expert manner, many of the assumptions made in the plan, including the references to the various guidelines/regulations/etc. However, as a resident of over 30 years, and with a family I have brought up here, I do feel able to comment albeit on just a few specific points.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

I write to you to provide my objections to the Local Plan outlined by Guildford Borough Council. I have spent time participating within the GBC organised exhibitions and reading through the documentation provided.

I am a local resident of West Horsley. I live on Mount Pleasant.

I am deeply dismayed at the proposals for development that have been put forward. These are incongruous to this village and the principles of the green belt.

The volume and density of the proposed housing development is unseen in the Horsley villages. I understand the volume increase to be 35% additional housing within five years and the density to be 5 house / hectare whereas the Horsley's is currently 2/3 houses / hectare.

The Local Plan is inappropriate to the character of the Horsley villages. This is a semi-rural green belt village. West Horsley has one shop and a village hall. It does not have a commercial centre. This is a semi-rural village. Children play safely outside their houses and cycle to their friends houses, deer wander in to gardens and I can hear a rooster calling as the sun rises. The volume and density of housing proposed belong within an urban area not within the villages of the green belt.

Further to this should the proposed development go ahead the Local Plan makes no provision whatsoever for additional infrastructure such as schools, doctors, trains, car parks, roads that would be needed to accommodate an additional 550+ houses that represent the 35% additional housing.

Where will the children go to school? The local school is already full.

How will adults travel to work? The trains and station car park is already full.
How will the existing roads cope with the additional cars? Will there be more traffic jams/accidents?

How will sick people access medical help? The doctors surgery is already busy.

The Local Plan does not represent a solution that is sustainable for existing communities or future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3710</th>
<th>Respondent:</th>
<th>15618689 / Julia Ray</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The plan at Garlick's arch does not take infrastructure into account. Clearly this is because it is known that the infrastructure will not be able to cope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3709</th>
<th>Respondent:</th>
<th>15618689 / Julia Ray</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I cannot verify this number to be correct. Transparency should be provided because it appears that the number has doubled from previous years and this cannot be correct.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7042</th>
<th>Respondent:</th>
<th>15618689 / Julia Ray</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick's Arch is Greenbelt. I want to protect our greenbelt for our future generations. It is precious and it is loved by our communities. It creates a better environment for us and a happier, healthier place to live. We cannot live happy lives with endless sprawl. We need access to green spaces and this is a protected site. It has not purpose being suggested for housing, which should be built on brownfield sites only and in urban areas. Our natural environment cannot be replaced and should not ever be considered appropriate to develop.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7043  Respondent: 15618689 / Julia Ray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not want these new ramps as there will be a flood of traffic through the villages. build on. This ancient woodland provides a habitat for thousands of birds and animals and trees and destroying it would be criminal to my mind. This site is entirely inappropriate for development.

Not least because of its propensity to flood.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15661  Respondent: 15618689 / Julia Ray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Use the brownfield site at Burnt Common for industrial sites not Garlick's Arch. Shame on you for suggesting destroying our natural environment in the name of profit. We would all suffer if Garlick's arch were urbanised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15660  Respondent: 15618689 / Julia Ray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The developments being proposed are vast and the consequences will be felt on peoples health with the increased pollution. I have a daughter with asthma and know how serious childhood illnesses exacerbated by pollution can be.

The traffic is already horrendous, we do not want more cars on the roads. There are currently just sufficient parking spaces in Ripley and around. It would not take many more cars on the roads to tip that balance and make for example taking the kids to the park, an impossibility for those who already need to drive into the village centres. The frustrations of congested roads decreases our quality of life as they are horribly stressful, together with the pollution caused and damage to our environment. Many of the roads already require passing places as they are narrow - more traffic will increase the number of accidents as more cars try to navigate these narrow roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15659  Respondent: 15618689 / Julia Ray  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The greenbelt is highly precious to those in this area - and also to those in London who can access green areas within striking distance. You are pushing the urban sprawl from London further and further out and destroying the pleasure and health benefits our community gain from these areas.

Consider brown field sites only. If you develop our loved green belt, it is gone for ever, which will a travesty. Previous generations provided this for us with good intentions and the benefits they hoped would last for future generations. We went to keep our green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of houses being proposed is absolutely disgusting. You are creating urban sprawl with no thought to the congestion that will be causes to the surrounding areas. The nearby M25 (have you seen the gridlock in the Heathrow direction daily?) and A3 are already badly congested as is the main road through Ripley. Increasing the number of cars so dramatically is actually downright dangerous and irresponsible. Having driven on the A3 in rush hour often, your plans are complete madness. Since nearly every household will be a 2 car household, this will add thousands of cars to our roads. The future generations deserve better - open spaces and less pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am at a loss to understand why this Planning Application has not been dismissed out of hand for several reasons.

As a local resident trying to get into Guildford on a daily basis along the A31 and A3, the traffic we experience already makes what should be a 10 minute journey into one that can take as long as 45 minutes, the road infrastructure will not cope with the additional 3k-4k cars that this development will engender.

The new proposed road from the Research Park to the new estate will cut through important Ancient Woodland which has, to date, acted as the original boundary to defensible Green Belt and this together with the wider area is an important wildlife habitat for numerous animals, plants and insects.

This area that is under threat comprises an AONB, Area of Great Landscape and Greenbelt which should be protected by law, so again, a development of this size (or any size to be honest) should not be contemplated on this site particularly
given the fact that there are already empty premises that could be utilised and there is room on the Research Park to build more large commercial buildings if required.

Also the infrastructure we have currently will not cope with the additional requirements of the development which will mean that more will need to be done possibly affecting a larger area than currently proposed and given the additional pollution this will cause means the health of current residents is likely to suffer in the short, medium and longer term.

This is not something that should be considered just because the University needs to add to its coffers. It already has outstanding Planning Consent to build student accommodation on Moor Park and this should be enforced before any further Planning is even considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3712</th>
<th>Respondent:</th>
<th>15618817 / Carla Hollingsbee</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to register my OBJECTION to the proposed building/housing development proposals that are being put forward by the GBC in their Plan.

Although I do not live there at the moment, my Mother lives in East Horsley and, apart from visiting her 2 or 3 times per week, our plan is to move there in 3 years time. So, you can see I have a deep vested interest and concern as to what happens to East Horsley.

So, any potential new housing developments are particularly important to me.

My principle objection is about infrastructure. The roads, the schools, the services are even now at breaking point…..so the effect of a developments at Wisley Airfield, opposite the station at East Horsley, or at the Thatcher’s Hotel is ill thought through, and frankly, incredible.

The roads around East Horsley are, in the main B roads and lanes. This is not the area to add 5,000 or 6,000 cars a day. It would be dangerous, people’s lives would be at risk and the pollution from the cars would dictate that we as adults and particularly our children would have to go around wearing masks like they do in Japan and China. Is this what the planner’s want?

It is inconceivable that the writers of the Draft Plan didn’t reach the conclusion that the East Horsley/Wisley Airfield axis is NOT the place for development.

In addition the Ockham Road South between the two village ‘centres’ in East Horsley is so narrow (around Coningsbees) that two busses cannot pass each other. ….and many many times I have seen big vehicles mount the pavement at that point….just image another 100 cars per hour coming through there! Just last week I was driving towards the station from Thatcher’s direction and a lorry – which must have been about 8 ft wide forced me off the road – ie I had to mount the pavement.
This area also floods and many times I have seen pedestrians splashed with gutter water. No doubt all these problems are curable but, as we all know, Surrey County Council – who are responsible for highways – have no money…..so how they are going to afford all the other grandiose schemes like slip roads on to the A3 and dynamic improvements to the roundabout underneath the A3 at the end of Ockham Road North? It is all just ‘pie in the sky’ thinking.

Whist writing I would also condemn any proposal that targets building on woodland. My thoughts are about Garlic Arch on the old Portsmouth road between Ripley and Send.

Building on grassland is one thing but never, never ever should woodland be considered. It is the home of thousands of animals and plants – and it MUST be preserved. We share this planet with myriads of other creatures…..and it is the responsibility of the Planners to safeguard all of us….not to destroy everything that is worthwhile and valuable in this world.

This is now the time that the Planners of GBC have to be strong, thoughtful and they have to stand up and be counted. If we cannot build more houses then say so to the government or anybody else for that matter and challenge them to do their worst. But…do not weaken your own resolve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3714  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in particular to including Sites A36-41 (East and West Horsley). This is a back-door way to create a mega-village – essentially, a soulless new dormitory town. The Horsleys feel victimised by this plan, which has been masterminded by Council leaders representing Ash and Tongham at the other end of the borough, where (in a flagrant case of political double standards) the Green Belt is actually being extended under Policy P3.( 15 Councillor Paul Spooner and his predecessor, Councillor Stephen Mansbridge)
Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.
Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities. (Even some property developers complain about the Council’s bias in favour of oversized developments, e.g. Dandara, whose relatively small Green Belt site on the A246 (Epsom Road) in West Horsley is not considered in the plan)
Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than putting forward site proposals as a fait accompli.
These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:
• Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
• Guildford Council’s Education Review says “expansion options may need to be considered for primary” education in the
Horsley area within the first 5 years of the plan, but Surrey County Council have no plans to do so. The Raleigh School is already full. The private Glensk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan’s stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.

- The plan’s Infrastructure Schedule (Appendix C) imagines an “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC” but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not “improve” it.

The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with over 2,000 new homes only 2 miles away (see below).

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present. Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites militate against NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has since been adopted by cyclists as a permanent asset, including the annual Prudential cycle race. These and future examples of “positive planning” depend on protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers’ plans, since the site would then be vulnerable to infilling with yet more housing.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events associated with climate change. The “appropriate mitigation” suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt “exceptional circumstances”. Policy A40 underestimates the problems of safe access and egress.

Firstly, Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly. Secondly, access problems are not confined to flooding and are not addressed by the proposal to extend the existing 30mph zone past the site entrance.

Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glensk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.
- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
- The road’s increasing use by recreational cyclists (see above).
- Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic.
- Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.
- The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course’s planning application to re-landscape its site using bulk waste transported from London.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT also to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. (Application reference 15/P/00012)
This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.
This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. (Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director & descendant of the David Cameron).
Policy A35 should be removed from the plan for all the reasons the development was rejected by the Planning Committee, including:
- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley
above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14). (The River Mole would flood even more badly should a new runway be built at Gatwick.)

• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

In addition I object to the following policies in the Town Plan.:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15676  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15677  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.
This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15678  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet their requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15679  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

- The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
• The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
• The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.
• All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15674  Respondent: 15618881 / Jayne Barmby  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys). This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand. The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

11 NPPF 59: “Local planning authorities should consider… the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15675  Respondent: 15618881 / Jayne Barmby  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and de-population, just as expansion of the suburbs did to mid-20th century London.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15671  **Respondent:** 15618881 / Jayne Barmby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. This has been challenged by residents including, by Mr Ben Paton, as far as the Information Ombudsman. But the Council have consistently refused to seek disclosure of the model.

Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. The OAN is objective and the Housing Target is subject to constraints."

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15672  **Respondent:** 15618881 / Jayne Barmby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

---
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/15680  Respondent: 15618881 / Jayne Barmby  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communication services. The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then
proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. (Residents have been incredulous at the Council’s failure to apply infrastructure constraints to housing numbers, in response first to the 2013, There were 20,000 responses each time.)

This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15681  Respondent: 15618881 / Jayne Barmby  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy is too vague and optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15682  Respondent: 15618881 / Jayne Barmby  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the issues and Options paper and then to the 2014 draft local plan specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in East and west Horsley and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust.

One in two working people in Guildford commute for up to 3 hours a day, as I used to do. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town. Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15668  Respondent: 15618881 / Jayne Barmby  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPP16/17926  **Respondent:** 15618881 / Jayne Barmby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to I4 - green and blue infrastructure particularly the sites in East and West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15673  **Respondent:** 15618881 / Jayne Barmby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15665  **Respondent:** 15618881 / Jayne Barmby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT. This policy states, “the general extent of the Green Belt has been retained.” This is untrue. The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:
- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

(See Ministerial foreword: “Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.”)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
argues that we should sell 1.6% of the Crown jewels in order to build houses.
I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth.
It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods.
Unfortunately, this democratic, bottom-up approach has not been attempted.
Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.
I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems determined on self-defeat.
I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. (Councillor Matthew Sarti, Planning Committee meeting, 18 May 2016)
To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.10

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15669  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014, This plan is out of date and not creditable. (Further discredited by criminality on the Council. Former lead Councillor for planning Monika Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence on 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.)

13 Some residents have concluded that commenting is a waste of time. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. (E.g. Gallagher Homes v Solihull Metropolitan Borough Council [2014] EWHC 1283)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17924</th>
<th>Respondent: 15618881 / Jayne Barmby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 draft Guildford local plan, specifically policy P2-green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15667</th>
<th>Respondent: 15618881 / Jayne Barmby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT. This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger
policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. Apart from being a scandalous misuse of local political patronage, this policy effectively says, “Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17925  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to P 3 countryside beyond the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18584  Respondent: 15618881 / Jayne Barmby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1 gives no definition of “sustainable development”. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
There is a gap in Policy S1 with regard to Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/15670 **Respondent:** 15618881 / Jayne Barmby **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

---

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:-

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market. These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so the housing numbers derived from it are unreliable. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford want 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly uneven distribution is unexplained.

3. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despiterepeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda, provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

4. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain
how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability.7 Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

5. It is irrational to embark on a radical transformation of the borough without a clear Housing Target. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>Does the evidence for housing need still stand up with the Brexit vote?</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15689  Respondent: 15618977 / Chris Marles  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>Burpham already has significant problems with road traffic. Adding thousands of extra vehicles onto these roads would only help to ensure gridlock.</td>
</tr>
<tr>
<td>The priority ought to be that the infrastructure is first put in place with 4 way A3 access and the tunnel.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15690  Respondent: 15618977 / Chris Marles  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>Surely Green Belt is sacrosanct.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
<tr>
<td>Comment ID: PSLPP16/15709</td>
</tr>
<tr>
<td>---------------------------</td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td><strong>Policy D1 - Making Better Places</strong></td>
</tr>
<tr>
<td>I object to GBC not listening to their residents saying what they need to make their areas better places.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15710</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Policy D2 - Sustainable Design, Construction and Energy</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I agree that all new developments, whatever the size, should conform to the above.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15711</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Policy D3 - Historic Environment

I object to GBC not respecting the historic environment of the rural villages when considering inappropriate large developments. These areas need protecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attach documents:

---

Policy D4 - Development in Urban Areas and Inset Villages

I do not object if policies H2 and H3 are implemented and all H2 developments are implemented without developers using clause 4.2.40 to escape their responsibilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attach documents:

---

Policy E1 - Meeting Employment Needs

I object to the loss of employment opportunities. I object to development of brownfield sites without some commercial activity being included, proportionate to the size of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attach documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E2 - Location for New Employment Floor-space

I object to development in the rural areas of the Greenbelt when Guildford brownfield sites area available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15702  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E3 - Maintaining Employment Capacity and Improving Employment Floor-space

I object to permitted development which is decreasing employment opportunities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15703  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E4 - Surrey Research Park

I support the Research Park and its specialism, but I object to the current need to expand. The land hungry current ground level car parking for Research Park should be utilised for shared multi-storey or underground parking and the freed-up car parks used for the Park development. All new Research Park development should include underground car parking, as in other countries.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15704</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 - Rural Economy

I object to increasing the rural economy to accommodate large, unsustainable, dormitory towns, i.e. Gosden Hill, former Wisley Airfield, Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15705</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E6 - Leisure and Visitor Experience

The area is already a tourist area and should be encouraged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15706</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Policy E7 - Guildford Town Centre

I object that GBC do not accept the town centre as the perfect place for sustainable development. Internet shopping has changed the retail landscape and that will continue in the future so limited new shops are required, so sustainable housing and fewer shops should be provided for in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15707  Respondent: 15619041 / Jack Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E8 - District Centres

I object to rural villages becoming District Centres as they are just preparing the infrastructure for large housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15708  Respondent: 15619041 / Jack Cross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E9 - Local Centres

I object to Local Centres being considered to provide large, inappropriate, developments nearby.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15693  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 - Homes For All

I object to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not done so. Freeing up private housing in the town currently used for student accommodation and that housing could provide local people with affordable housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15694  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 - Affordable Homes

I object that developers can be released from their obligation to provide affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15695  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy H3 - Rural Exception Homes**

I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15713</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy I1 - Infrastructure and Delivery**

I object to any development without the necessary infrastructure being put in place prior to development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15714</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy I2 - Supporting the Dept of Transport's Road Investment Strategy**

I object to this policy only relating to the strategic road network, the A3/M25 and not local roads which will be overwhelmed by large developments, regardless of any strategic road network improvement. Wisley will completely overwhelm Ripley and Horsley and the roads will become rat-runs to stations, particularly Woking with its fast trains to London.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15715</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Policy 13 - Sustainable Transport for New Developments**

I strongly object to any development being built that does not have existing sustainable transport. Blackwell Farm, Wisley Airfield, Gosden Hill and Garlicks Arch do not have such facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15716</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Policy 14 - Green and Blue Infrastructure.**

I support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15696</th>
<th>Respondent: 15619041 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy P1 - Surrey Hills Area of Outstanding Natural Beauty**

I object that the AONB areas are excluded from taking a proportion of new housing developments. These areas should provide homes for local people and their families.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15697  **Respondent:** 15619041 / Jack Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy P2 - Green Belt**

I strongly object to GBC considering building new developments of 2,000 houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns in the Green Belt for reasons of economy and convenience. Wisley in particular is too close to neighbouring towns and would undoubtedly become part of those areas in time, completely eroding the Green Belt in this area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15698  **Respondent:** 15619041 / Jack Cross  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P3 - Countryside

I believe brownfield sites in all areas, including AONB, should be utilised to provide some affordable and Rural Exception Homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15699  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4 - Flood Risk and Water Source Protection Zones

All development sites must take into account current flood problems and the effect of any new development on those problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15691  Respondent: 15619041 / Jack Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1 - Presumption in Favour of Sustainable Development

I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but the Greenbelt sites to create new towns of 2,000 houses. These sites are not sustainable, but will cause chaos to surrounding areas in terms of infrastructure, i.e. roads, parking, flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 - Borough Wide Strategy

I object to GBC using SHMA housing figure which are far in excess of those in Woking and Waverly. I object these figures were prepared by consultants with a property interests, G L Hearn, and the calculation has not been scrutinised by GBC an independent body.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7059  Respondent: 15619073 / Paul Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

1. Crownhall Estates (CE) has long standing land promotion agreements in place with the owners of land falling within the overall allocation (edged blue) as shown hatched red on the plan.
2. These land promotion agreements predate the identification of this allocation in the current Draft Local Plan and the promotion of the larger allocation by Ptarmigan Land (PL) on behalf of the owners of that land.
3. Sites A and B are previously developed land1 which could accommodate circa 35 dwellings accessed from Portsmouth Road and Burnt Common Lane respectively.
4. Sites A and B are deliverable housing sites in their own right (as defined by Footnote 11 to Framework Paragraph 47 in that they are available now, offer a suitable location for development now, and are achievable with a realistic prospect that viable housing could be delivered on the site within five years) and both could assist the Council to identify and maintain a 5 year supply as part of the identified annual housing requirements for the district from the base date of 2018 without reliance upon or prejudice to the delivery of the larger allocation or the intended access to same from the A3 (Site Allocation A43a) later in the plan period.
5. However, CE is willing to work with PL and Guildford Borough Council (GBC) to enable the comprehensive development of the wider site as envisaged in the allocation and to ensure that development on each land parcel is complementary to the other and planned in manner that forms an effective and efficient holistic development of the overall allocation for its intended purpose but considers that in the circumstances here the wording of Draft Policy 43 will need to be amended (possibly by adding more detail as to how it is envisaged that the overall package will be delivered particularly with regard to component elements and phasing) so as to allow these two deliverable sites to be released so that they can assist the Council to maintain a 5 year supply whilst the remaining and larger developable part of the site (for years 6 – 10) is put in place with the corresponding level of infrastructure.
6. CE looks forward to working with PL and GBC so as to deliver this allocation.

<see attachments for relative media>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Image A9Ra224nq_o2grrn_1a8.jpg](A9Ra224nq_o2grrn_1a8.jpg) (72 KB)
[Image A9Reyurgi_o2grrx_1a8.jpg](A9Reyurgi_o2grrx_1a8.jpg) (56 KB)

---

Comment ID: PSLPS16/7060  Respondent: 15619073 / Paul Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Crownhall Estates (CE) has a long standing land promotion agreement in place with the owners of the 2 hectare parcel of land as edged blue on the plan.
2. The site is partly previously developed land and partly greenfield and that part of the site shown with green hatching is designated as a "Site of Nature Conservation Importance" (SNCI) primarily due to the site being noted as a “Water Vole Alert Area” due to the presence of the pond and stream on the site.
3. Sites of Nature Conservation Importance' (SNCIs) are local designations which do not in themselves restrict development for the purposes of the Framework and in this case the site could be developed as allocated by setting aside and protecting the areas that are used by water voles (the ponds and the streams) so that any harm to this protected species would be avoided.
4. There are no other known constraints on development and the close proximity of the site to the railway station and the site for a proposed new school means that opportunities to maximize sustainable transport solutions for future residents of any housing and those already living in the area can be delivered by way of any development.
5. CE therefore considers and confirms that this is a deliverable housing site for up to 50 dwellings as envisaged in the allocation and should be identified as such in the allocation (currently the allocation suggests that the site is “developable” (years 6 – 10) rather than “deliverable”) years 1 -5) recognizing that any proposed development will need to address the site constraints identified.
6. Therefore CE looks forward to working with GBC so as to deliver this allocation.

<see attachments for related media>

---

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Image A9R19q51xi_o2grs0_1a8.jpg](A9R19q51xi_o2grs0_1a8.jpg) (137 KB)

---

Comment ID: SQLP16/1737  Respondent: 15619073 / Paul Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
Yes subject to comment below

COMMENT: Objectively Housing Needs should be reviewed and updated at submission to reflect the most up to date position as we consider that the annual housing requirement based on same is higher than that currently stated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1738  **Respondent:** 15619073 / Paul Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Yes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1739  **Respondent:** 15619073 / Paul Collins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

COMMENT: We broadly support the strategy set out within Policy S2 with regard to the delivery of development to meet the needs of the Borough over the plan period and note the fact that Policy S2 explains that the targets set out for each year of the plan post-adoption are not a ceiling, thus emphasising that these are minimum requirements and that delivery in excess of these targets is supported.

However, having regard to the supporting text to the policy and the housing trajectory set out in the 2016 Land Availability Assessment, it is evident that the plan currently anticipates that much of the delivery will occur in the later years of the plan period, when infrastructure delivery will facilitate large-scale allocations to be brought forward and that a number of smaller deliverable housing sites (i.e. sites which are available now, offer a suitable location for development now, and are achievable with a realistic prospect that housing will be delivered on the site within five years (2018–23)) are being allocated in the plan on the basis that they are developable sites (i.e. developable in years 2022–2028).

Having regard to historical under delivery in the Borough and the National Planning Policy Framework’s (NPPF) emphasis on significantly boosting the supply of housing as soon as possible, it is imperative that any opportunities to deliver
identified residential sites early in the plan period are maximised in order to minimise the adverse socio-economic impacts associated with an under-supply of housing.

Therefore it is considered that to be considered sound the Plan needs to illustrate and demonstrate which of the proposed allocated sites are considered deliverable (as opposed to developable) and will be expected to deliver the full range of housing necessary to demonstrate and maintain a five-year supply of housing land to meet the housing target from the base date of 2018.

Early delivery of those sites which are deliverable and relatively unconstrained should be particularly welcomed and expedited in light of the low rates of delivery in the first years of the plan period, in order to reduce the cumulative deficit against the housing requirements

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1740  Respondent: 15619073 / Paul Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

COMMENT: Unable to comment due to insufficient information or published evidence pertaining to same at this date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1741  Respondent: 15619073 / Paul Collins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Yes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: SQLP16/1742

**Respondent:** 15619073 / Paul Collins  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**COMMENT:** In order to be considered Framework compliant and therefore sound, more detail is required regarding each of the proposed allocations. In particular the Plan needs to clearly identify key sites which are critical to the delivery of the housing strategy over the plan period; identify which sites (or parts of sites) are considered deliverable and necessary to maintain a 5 year supply from the base date of 2018 and which are considered to be specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPA16/3729

**Respondent:** 15619201 / Michael Conoley Associates (James Deverill)  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

This representation reviews the Guildford borough Proposed Submission Local Plan: strategy and sites document, currently out to consultation, and details our comments on particular draft policies. It also suggests an alternative site, for which we are the agent, which we believe is suitable for delivering much needed additional housing within the borough. The site proposed is land east of Glaziers Lane, Normandy, Guildford, Surrey GU3 2EB.

... It is considered that the site detailed previously is more suitable for delivering much needed additional housing within the borough than some allocated sites within the draft Local Plan. This site is within a very sustainable location, available for development and deliverable within 1-5 years.

The site has been assessed previously by the Council and it was concluded that if sufficient housing land cannot be found in the urban areas and village settlements, this site is potentially suitable for residential development.

The position of the site, adjacent to the Flexford settlement boundary, ensures much needed additional housing could be provided in a sustainable location with only a modest indentation into the existing Green Belt.

The site is more appropriate for residential development in landscaping and ecological terms than other sites allocated within the draft Local Plan for Normandy and Flexford.
The site is in a sustainable location adjacent to Wanborough Station and on bus and cycle routes. The site has easy highways access on to the A31 Hogs Back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [MCA Representations 2016 submission Glaziers Lane.pdf](MCA Representations 2016 submission Glaziers Lane.pdf) (450 KB)

---

This representation reviews the Guildford borough Proposed Submission Local Plan: strategy and sites document, currently out to consultation, and details our comments on particular draft policies. It also suggests an alternative site, for which we are the agent, which we believe is suitable for delivering much needed additional housing within the borough. The site proposed is land east of Glaziers Lane, Normandy, Guildford, Surrey GU3 2EB.

... It is considered that the site detailed previously is more suitable for delivering much needed additional housing within the borough than some allocated sites within the draft Local Plan. This site is within a very sustainable location, available for development and deliverable within 1-5 years.

The site has been assessed previously by the Council and it was concluded that if sufficient housing land cannot be found in the urban areas and village settlements, this site is potentially suitable for residential development.

The position of the site, adjacent to the Flexford settlement boundary, ensures much needed additional housing could be provided in a sustainable location with only a modest indentation into the existing Green Belt.

The site is more appropriate for residential development in landscaping and ecological terms than other sites allocated within the draft Local Plan for Normandy and Flexford.

The site is in a sustainable location adjacent to Wanborough Station and on bus and cycle routes. The site has easy highways access on to the A31 Hogs Back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Location
The site is located to the east of Glaziers lane and to the north of Flexford. It is greenfield land, under private ownership and immediately deliverable.

The alterations to the settlement boundary within the proposed Local Plan 2016 submission now include the large A46 site to the west. Should the redefined settlement zone be agreed, the site will be bordered completely on two sides. An extract from the proposed Local Plan illustrating this is included below: <see attachments>

It is within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area and is moderate/good agricultural land (grade 3). It is located within Flood Zone 1 (low risk).

Assessment of Site Opportunities and Constraints
Outside Guildford town centre, established urban areas, inset villages and identified Green Belt villages, the site is in a very sustainable location. It is adjacent to Wanborough Railway Station which has two services an hour to Guildford taking just 7 minutes and two services an hour to Aldershot taking 11 minutes. A regular bus service also runs down Glaziers Lane (with a bus stop next to the site) linking the area to Guildford, Aldershot and Woking. The site is also only 2 miles from the Puttenham junction of the A31 Hogs Back giving excellent vehicular access to the rest of the borough and south to Farnham. It is well located for easy access to cycling routes.

Site Planning History
The site was identified as potential development area H10-B in the Green Belt and Countryside Study. It scored three against the purposes of the Green Belt and is ranked 22nd in terms of sustainability criteria. The site was classified as suitable, available and viable for residential development in the Strategic Housing Land Availability Assessment (SHLAA reference part of site 2010). It was also included within the Local Plan Issues and Options (reg 18) document and given the reference 68. This document concluded that if sufficient housing land cannot be found in the urban areas and village settlements, this site is potentially suitable for residential development.

Suitability for Inclusion within the Local Plan 2016
As discussed in section 2, the Local Plan submission proposes a number of large urban extensions and new settlements to deliver the levels of assessed housing required over the 15 year plan period. Many of these sites are dependent on infrastructure improvements which are yet to be agreed with the Department of Transport. Therefore, the majority of the housing proposed is back-loaded to the later years of the plan and may not be deliverable within this time period at all.

There is a shortfall within the Local Plan submission of housing which could be delivered in the first five years of the plan period. This site could help reduce the shortfall as it is within a very sustainable location, available for development and deliverable within 1 to 5 years. It has been assessed previously and found by the Council to be suitable for residential development should sufficient housing land not be found in urban areas and village settlements. The Local Plan submission does not meet this requirement and therefore the site at Glaziers Lane should be promoted by the Council.

Comparison with alternative sites allocated within Normandy and Flexford
The Local Plan submission allocates two sites in Normandy and Flexford for residential development. Policy A46 is a large village expansion between the two settlements and will be of mixed use including 1,100 new homes. Policy A47 is a site on Land to the East of the Paddocks, Flexford and is allocated for 50 dwellings. Direct comparison between these sites and the land at Glaziers Lane is clearly difficult given the differing scales of development but this site will have considerably less impact on the landscape and ecology.

An assessment of the landscape impact of development on these sites has been undertaken by Jon Etchells Consulting; a practice registered with the Landscape Institute, with extensive experience of landscape design and assessment. With regard to A47 he notes;
“The landscape to the west of Glaziers Lane is very different; it is more rural, relates far less to the settlement edge and is of much higher quality. It is in productive agricultural use, is expansive with long range views across it, and contains a number of large areas of Ancient Woodland. Development here would have significant adverse effects on the landscape, over a wide area.”

And concludes that;

“This large scale development would be likely to have adverse effects on the setting of the nationally designated landscape of the Surrey Hills AONB, as it would cover a large area and would include some large scale buildings for the proposed secondary school, which is intended to be at the southern end of the draft allocation site, closest to the AONB. This potential effect would be increased significantly if the AONB boundary were to be extended to the north into the AGLV, as is currently under consideration.”

In comparison, the landscape of the application site is small scale, enclosed and strongly related to the settlement edge. It contains no valuable landscape features, and would have no effects on the setting of the nearby AONB by virtue of its limited extent, buildings of residential scale only and screening along its boundaries.

The site at A47 is similar in landscaping terms to the site at Glaziers Lane as it abuts the settlement, is well screened and comprises residential garden and paddocks. However, the majority of it is designated as a SNCI and lies within an area identified as a ‘water vole alert area’. A stream cuts through the centre of the site and potential mitigation measures may restrict the actual developable area. It appears unlikely, therefore, that this site can deliver the number of houses proposed and it seems somewhat perverse for the Local Plan to designate an area for nature conservation value, but also propose its development, if there are alternative sites such as land east of Glaziers Lane available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: A9Rei4p70_11mafdn_vs.jpg (198 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all
It is agreed that new residential development should make the most efficient use of land whilst responding to local character, context and distinctiveness. This said, some existing housing areas in the borough were developed at a time when there were not the constraints on available land that exist today and as a result are low in density. To limit the impact on the countryside and reduce future incursion into the Green Belt, developers should be encouraged to increase density where this will not impact on the character of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18689  Respondent: 15619201 / Michael Conoley Associates (James Deverill)  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2: Affordable homes
The provision of affordable housing is dependent on it being financially viable for developers to build market housing. Whilst the policy notes that affordable housing contributions may be provided off-site, or with payment in lieu where the Council agrees that on site provision is impractical, the 0.17ha site area criterion set by the policy triggering affordable housing provision is so restrictive that many sites appropriate for development will not be financially viable. Therefore, financial viability studies will be required even for the smallest developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18690  Respondent: 15619201 / Michael Conoley Associates (James Deverill)  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P2: Green Belt
It is agreed that the forthcoming Green Belt Supplementary Planning Document (SPD) should set out guidelines on the scale of development that this likely to be considered appropriate and how this is calculated. This will help provide greater clarity to applicants wishing to extend their homes although the figures should still be considered in relation to other design criteria.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18687  Respondent: 15619201 / Michael Conoley Associates (James Deverill)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Borough Wide Strategy
The West Surrey SHMA found that the housing shortfall in the borough was much greater than expected. It concluded that:

"Taking account of these adjusted household formation rates for younger households and adjustment for student growth, the SHMA draws the following conclusions on the overall need for housing across the HMA to be at 1,729 dwellings per annum with need in Guildford at 693 dpa."

To make up for this shortfall, the plan makes provision for 13,860 new homes which would average 924 dwellings per annum. This is a higher level of development than experienced in Guildford borough during the previous Local Plan period and higher than the assessed need to build flexibility into the plan. The Annual Housing Targets set within this policy average out over the 15 year period at the required 693dpa but delivery is back-loaded to the latter years of the plan. Over the first five years a target of just 2,950 has been set which equates to a delivery of 590dpa. This is considerably less than the assessed need and therefore contrary to the requirements set out in paragraphs 47 to 49 of the NPPF.

We consider that to comply with the requirements for a deliverable five year supply of housing land, the Council should promote additional sustainable smaller sites on the edges of existing settlements that would be deliverable in years one to five of the Local Plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18686  Respondent: 15619201 / Michael Conoley Associates (James Deverill)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Spatial Vision
The plan provides for the delivery of 13,860 additional homes by 2033. Considerable effort has been undertaken by the Council to understand the borough’s housing needs through the Land Availability Assessment (LAA) and Strategic Housing Market Assessment (SHMA) and, for the purposes of this representation, we do not seek to challenge the Council’s conclusions in this regard.

We agree that the preferred location for this development should be existing brownfield sites however; only 2,800 units are proposed by the plan for the urban areas which take advantage of the existing infrastructure and services. The plan notes the benefit of these sites is that they reduce the need to travel and offer alternative modes of transport to the private car.

Significant expansion is also planned to the Guildford Urban Area and around Ash and Tongham which takes advantage of the existing infrastructure and services.

Much of the remaining provision is in a new settlement at Wisley (2,000 homes) and a significant expansion at Normandy and Flexford which will provide over 1,000 homes. As noted within the plan, the delivery of some of these major sites is dependent upon major improvements to the M25/A3 interchange and the A3 around Guildford and therefore the houses will not be able to be delivered until the later years of the plan. Some of the larger sites may not be deliverable within the plan period at all should agreement not be received from the Department of Transport for the infrastructure improvements. Therefore, it appears the delivery of the required 13,860 additional homes may not be achieved by this plan.

The plan also proposes almost 1,200 dwellings on non-strategic sites within and around existing villages and over 750 dwellings as extensions to existing villages. We agree that this is important because it will help offer a variety of housing in villages and help contribute to maintaining and improving local services and village life. When Michael Conoley Associates have organised Public Consultations for small residential developments in villages in the borough, the overwhelming feedback from residents is their support for schemes which will improve the facilities and services in their village and provide lower cost housing that their children may be able to afford and allow them to continue to live locally.

A number of smaller more sustainable sites on the edges of villages have been identified in the past by the LAA and the Green Belt and Countryside Study but omitted from the Proposed Submission Local Plan, the Council apparently having concluded that the provision of the larger sites will limit the impact of new development to a few pockets within the borough. Given the majority of the proposed housing will only be deliverable towards the later years of the plan period (if ever) we consider that additional smaller allocated sites should be included within the document to meet the supply requirements for the shorter term (first five years in particular). As discussed in 2.2 it would make sense that the small sites which are promoted are those that are located in villages which benefit from existing facilities and offer alternative modes of transport to the private car to lessen the impact on the overstretched road network in Guildford. As an example, both Normandy/Flexford and Ash/Tongham benefit from railway stations with regular and direct access to Guildford on the North Downs Line. This will improve following the addition of the proposed station at the Surrey Research Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The INFRASTRUCTURE does not start to be addressed until the housing is well under way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15729  Respondent: 15623425 / Jean Davy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The already impossible TRAFFIC CONGESTION in Burpham will become even more impossible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15730  Respondent: 15623425 / Jean Davy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The USE OF SO MUCH GREEN BELT LAND has been projected without real consideration being given to brown field sites within the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15727  Respondent: 15623425 / Jean Davy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The SHMA has not been thought through properly and the plan as it stands is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/15731  **Respondent:** 15623425 / Jean Davy  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is OFFICE SPACE STANDING EMPTY while homes are needed and should take priority over yet more office space.

In summary, I SUPPORT THE GUILDFORD RESIDENTS' ASSOCIATION RESPONSE in their objection to Guildford being enlarged by a quarter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7065  **Respondent:** 15623745 / Stella May  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A26 Blackwell Farm There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - "checking the unrestricted sprawl of large built-up areas". There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a
hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that
the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7066</th>
<th>Respondent: 15623745 / Stella May</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A55</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to 'enable delivery'. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15748</th>
<th>Respondent: 15623745 / Stella May</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 Making better places I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15749</th>
<th>Respondent: 15623745 / Stella May</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to Policy D2 Sustainable design, construction and energy. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15750  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D3 Historic Environment. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15751  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
I object to policy D4 Development in urban areas and inset villages. This policy that does not address the opportunity for building in the urban areas. The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

THE BROWNFIELD OPPORTUNITY
Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land. In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief. Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space. GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years.

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy E1 sustainable employment. I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VOA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15743  Respondent: 15623745 / Stella May  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy E2 location for new employment floor space I object to the policy of expanding the Research Park onto
Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high
quality area of Green BelThe Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to
expand to a further 9,000 sq m (14%)The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to
2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The
data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in
floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already
available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq
m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a
density of 25% plot ratio. The majority of existing buildings are 2 stories giving a developed floor space plot ratio of
12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt
land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the
top potential to match the existing densities of existing academic buildings on the university campus which are three to four
times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its
density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. A
preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient
transport hub.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15744  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E3 maintaining employment capacity I object to the ill-informed policy of resisting change of use from
B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land.
It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a
(offices) to C3 (residential). I believe that the existing government policy which has recently been made permanent of
allowing change of use from B1a to C3 is sound.

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making
them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic. The
reality of market demand is that the gross development value of refurbished residential space is in excess of the gross
development value of refurbished old office space in many locations (this gross development value assessment is supported
by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for
Guildford dated 2015). To resist change from B1a to C3 is contrary to the concept of brownfield first for residential
development schemes. To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the
concept of integrated mixed use communities whereby the journey to work is minimised. London has led the way with
significant residential schemes being created from redundant office stock. A good example is the South Bank in London
adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the
2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to
435 flats by St George. GBC needs to adopt more modern trends and policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E4 Surrey research Park. I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise. There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user. Research parks that lose their way stop being the location of choice for new innovative enterprises. I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing Monitoring indicators should include new start-ups and new patents created Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitment I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m Consideration should be given to the concept of shared “enterprise hubs” where individuals can take as pay go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park. The Surrey Research Park currently extends to 65,000 sq m There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker. The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%. The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy E5 Rural Economy In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character. Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. .

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local
tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead. THE TOWN CENTRE OPPORTUNITYI do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15736  Respondent: 15623745 / Stella May  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H3 Rural Exception Homes. This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15752  Respondent: 15623745 / Stella May  Agent:
I object to policy I1 Infrastructure and delivery Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services. The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value. The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem. The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceeding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan. The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service.
include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton. The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided. The following comments regarding the strategic sites are taken from the SHAR: Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road/Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3) Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8). Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14). Normandy/ Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction. Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction). Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane. Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy i2 Supporting the Department of Transport’s “Road Investment Strategy” This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15754  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I3 Sustainable transport for new developments This is another aspirational policy, not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport. The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths. The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK. The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means
longer travel times. Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town. I like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services. The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie. Cost of housing will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15755  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I4 green and blue infrastructure. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting. ABSENCE OF POLICY ON RIVER WEY I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that: It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;The special character of the landscape and townscape in the corridor is protected or improved;Views both within and from the corridor which contribute to this special character are protected or improved;Where appropriate, public access is provided to and along the River and the Navigations. The Nature Conservation value of the site is protected or improved

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15737  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they…” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities.” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage. Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered” “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable.” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate. Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up...
areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of: 1. Agricultural production

2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its ‘permanence’ this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure’.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15756  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to ALL Green Belt sites allocated for development in the local plan object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15739  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that
Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15740  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside. I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15741  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy P5 Thames Basin Heath Special Protection Areas. This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15732  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15733  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Page 823 of 2988
I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. "It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable." Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”.

This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.

There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our...
overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.

The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA. The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration.

These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.

2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.
3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014. 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply.

Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1743  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

I object
This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure

I object

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment

I OBJECT
The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have *An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF*. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would
increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queuing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

**The Spatial Hierarchy**

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

**Strategic Housing Market Assessment (SHMA)**

**I Object**

The “objectively assessed need” figure of 693 homes a year is too high.
A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land Assessment

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study

I object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** SQLP16/1744  **Respondent:** 15623745 / Stella May  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are **48.728 with high’s of 68 using National bias adjustment.**

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1745</th>
<th>Respondent: 15623745 / Stella May</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

_I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied are Greenbelt and considerable infrastructure issues. The solutions suggested to accommodate the inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations._

It was recommended by landscape consultant Alison Farmer Associates that the area known as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? _The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB._

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

_A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers._
There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford's need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as 'double accounting', which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term 'exceptional'?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.
Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as ‘South West Guildford Urban’ is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.
This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1746</th>
<th>Respondent: 15623745 / Stella May</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green /belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1747</th>
<th>Respondent: 15623745 / Stella May</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1748  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.
The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1035  Respondent: 15623745 / Stella May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7071  Respondent: 15624257 / Saleem Farooqui  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to oppose the development of land near Ripley.

The proposed site for housing is in the Local Plan as "Garlick's Arch".

Although GBC have been consulting with the public on the draft local plan since 2014 the Garlick's Arch development was only included in the plan just two weeks before it went to the full Council for approval at the end of June.

This area is beautiful and large scale development would desecrate the wonderful countryside here. Furthermore, my local clay pigeon shooting club (Cobham Sporting Gun) operates on this land and is a wonderful example of the kind of british country pursuit that this land development would quash.

Ripley and the surrounding land has an old world charm of an idyllic british village. Wholesale development would forever change the area awfully.

I implore you to reconsider developing here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3738</th>
<th>Respondent: 15624577 / Alec Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term...
considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15825</th>
<th>Respondent: 15624577 / Alec Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15830  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15798  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15801  **Respondent:** 15624577 / Alec Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15822  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15818  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students IRE accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15819  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15833</th>
<th>Respondent: 15624577 / Alec Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer-led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15807  Respondent: 15624577 / Alec Marshall  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15810  **Respondent:** 15624577 / Alec Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15813  **Respondent:** 15624577 / Alec Marshall  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15792  Respondent: 15624577 / Alec Marshall  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brownfield sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15794  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15786  Respondent: 15624577 / Alec Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15789</th>
<th>Respondent:</th>
<th>15624577 / Alec Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7076</th>
<th>Respondent:</th>
<th>15624705 / Chanelle Allen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  - The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  - The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  - The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  - The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  - The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  - The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.
After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3744</th>
<th>Respondent:</th>
<th>15624769 / Barbara Rose</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have view the proposed new development plans and after careful consideration we have decided that there are far too many dwellings proposed to be built in such a small area. Also if the Horsleys are taken out of the green belt there could be even more building works than what is already proposed at present.

We moved to a beautiful Surrey village 13 years ago to get away from town life, having had to live in a town due to work commitments. We are concerned that:-

The village doctors, schools and services are already just about coping, we wonder what will happen to our lives if thousands of people decent on the village, they too will want to use these services.

For those that work in London and use the train, the station car park will NOT be able to cope.

The development of the Wisley Air field is absurd with the only entry/exit onto the Ockham roundabout by the A3, there are so many accidents already on that stretch of road occurring with the volume of traffic. The only people interested in pushing this development are investors from overseas, they will get the planning and then sell on to developers for a lovely profit, not caring of the legacy they will leave behind.

If and when these areas are developed and the countryside and villages are ruined, are we not responsible for keeping our lovely “green and pleasant land” for future generations?

If London used brown sites, gaps and properties that are not currently lived in, it could cope for expansion for the next 10 years. A much better idea than ruining our green spaces.

Please, please give our plea careful consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On behalf of our client, Tyrrell Place Limited, please accept and register these formal representations to the Borough Council’s Proposed Submission Local Plan (Regulation 19) in relation to the Proposed Submission Borough wide Strategy and additionally to the omission of the Tyrrell Site, Long Reach Ockham from the list of sites proposed for future housing development.

These representations confirm our **objection** to the following Proposed Submission policies:

- Omission site: Former Tyrrell F1 Site, Long Reach, GU23 6PG (LAA site no. 1502). The failure to allocate this brownfield former industrial site for housing development.
- Proposed Submission Policy S2: Borough Wide Strategy. The absence of a clear linkage between sustainable patterns of development and the re-use of brownfield land in the Green Belt in advance of greenfield sites.
- Proposed Submission Policy P2: Green Belt. The absence of a clear local policy approach regarding the re-use of brownfield sites in the Green Belt.

**Background**

Tyrrell Place Limited **objects** to the Borough Council’s Submission Local Plan in relation to the omission of the Tyrrell Site, Long Reach, Ockham (‘the omission site’) from the schedule of Proposed Submission Housing Sites. We are particularly concerned that this brownfield site is not being actively promoted given the very favourable assessment of housing potential in the Council’s Land Availability Assessment (‘LAA’) February 2016 which forms a key component of the evidence base underpinning the Proposed Submission Local Plan.

The omission site comprises 5.7 hectares of land, much of which is established and permitted brownfield, within the current extent of the Green Belt. A significant proportion of the omission site is previously developed (brownfield) industrial land formerly occupied by Tyrrell F1 (the principal buildings are now occupied by a wedding accessory supplier).

The omission site is also subject to an implemented industrial and commercial development which could deliver a very significant amount of additional development footprint on the brownfield site of approximately 2,782 square metres of industrial space. Furthermore, a large expanse of the site is covered in tarmac hard-standing whilst there is also an established dwelling within the omission site. The site also accommodates the original Tyrrell F1 shed where the first Tyrrell Formula 1 cars were designed, manufactured and serviced.

The southern section of the omission site is undeveloped and characterised by grass and other vegetation. The northern, eastern and southern boundaries of the site are lined by existing trees. The woodland serves to visually screen the omission site from the surrounding countryside and from the principal through-road known as ‘Long Reach’.

Long Reach has dispersed development along its length including existing houses, playing fields, and a plant nursery. The village of Ockham is less than a kilometre to the north-east of the omission site and it is notable that Long Reach becomes steadily narrower and winds its way toward the B2039 and then on to the strategic highway network. The rural roads in this part of the borough are wholly unsuitable to accommodate modern heavy goods vehicles (HGVs) and service vehicles associated with the current and implemented industrial use.
In that respect, a new industrial occupier could intensify the industrial use of the omission site significantly and would not require planning permission to do so given the implemented planning permission and the large area of hardstanding that is already established on the site.

The omission site has no particular heritage, ecological or landscape importance attached to it. Furthermore, the omission site is not within a Conservation Area and there are no listed buildings on the site. The omission site is not located within the Area of Outstanding Natural Beauty (AONB) or within the Area of Great Landscape Value. Finally, there is SANG available locally to help fully mitigate the impact of new housing on the Thames Basin Heaths SPA.

The nearest railway station to the site is at East Horsley approximately 1km to the south east, where there is also a range of local shops and services.

The Potential for Redevelopment to assist the Housing Land Supply

Various discussions have taken place over the past 3 years with Council officers. The advice received on separate occasions from officers is an acknowledgement, in principle, that an element of redevelopment for housing is acceptable in place of the existing and potential industrial development. This view is unambiguously supported by the Borough Council’s Land Availability Assessment (LAA) February 2016.

We acknowledge that there has been disagreement between various parties and Council officers in relation to the quantum of new housing that Council officers would be willing to support on the omission site. Nevertheless, this brownfield site could make a valuable contribution towards delivering new homes, subject to detailed design considerations which could be delivered as part of a planning brief. This is also a view clearly shared by the Council’s LAA.

Delivering Brownfield First

The Foreword contained in the Proposed Submission Local Plan and produced by Leader of the Borough Council, together with the Spatial Vision (contained in section 3), both emphasise a clear preference towards delivering new housing development on brownfield sites in advance of developing greenfield sites. Yet despite those unambiguous statements and the vision, the reality is that:

1. The Borough Council is not promoting the established brownfield industrial land on the former Tyrrell F1 site for housing development.
2. The Borough Council is failing to meet housing need in the borough and has consistently under-performed in terms of housing delivery; and
3. The Proposed Submission Local Plan is promoting major greenfield, and strategic green belt land release to meet acute housing need, in direct conflict with its own stated objectives and vision regarding its ‘brownfield first’ development strategy.

Related Matters

A range of baseline studies have been undertaken to assess the likely impacts of delivering housing development on the eastern part of the omission site. Those studies include amongst others; a transport assessment, planning assessment, flood risk and surface water run-off assessment, land contamination study, and ecological (stage 1) assessments. All the studies carried out demonstrate that housing development can be delivered towards the eastern part of the omission site without causing any significant harm to amenities or the local environment.

Indeed the provision of new housing on the omission site will benefit local services and amenities by delivering a mix of housing for families and local people. Moreover, a modest amount of housing development would be far less visually prominent or harmful that an intensification of industrial use in this rural locality should the implemented (but as yet uncompleted) industrial premises be delivered by a new commercial occupier.

Housing Need and Land Availability Assessment

We note from the evidence base supporting the Proposed Submission Local Plan that housing delivery in the borough has not kept pace with identified housing need. Furthermore, the Borough Council cannot currently demonstrate a 5 year supply of deliverable housing land.
It is also highly notable that the Borough Council’s Land Availability Assessment (LAA) published in February 2016 specifically identifies the former Tyrrell Site (site no. 1502) as being a ‘realistic candidate for development’.

Indeed, the LAA cannot be any clearer in terms of the credibility of the omission site when it states that, ‘Provision of new homes here would help towards meeting the housing number in the Local Plan and contribute towards achieving sustainable, inclusive and mixed communities’ Additionally, the LAA is equally supportive in terms of the environmental credentials that new housing on this brownfield site would have on the local environs, it states, ‘There is no known reason why well designed new homes in this location, that take account of the amenities of the neighbouring properties, should have an unacceptable impact.’ The LAA concludes by stating that, ‘This site is most suited for residential development, to provide new homes to help meet the identified need.’

The only aspect of the LAA which we do not agree with is the very low density of housing potential (8 units at 2 dwelling per hectare) particularly in the context of the amount of approved and existing industrial floorspace on the site including existing residential development.

In this context we are mindful that the Borough Council needs to facilitate a significant step change in housing land supply and housing delivery in order to meet local housing need. Brownfield sites such as the omission site, which has received such a favourable assessment in the LAA, can help play their part towards meeting housing land supply, and in line with the vision contained in the Proposed Submission Local Plan, brownfield land should be considered in advance of promoting greenfield land.

It is also highly notable that the omission site is outside of the AONB and beyond the Area of Great Landscape Value and it can, with appropriate design and sensitive planning, play its part in helping to meet the borough’s acute housing need, in advance of releasing major greenfield sites.

The redevelopment of the omission site for housing would also secure a more appropriate use of the site than intensified industrial uses in a rural location where increased HGVs and service vehicles would cause detriment to the environment and to nearby residential amenities.

Conclusion

Discussions have taken place over the past 2 years between various parties and Council officers which have consistently demonstrated that officers accept that some residential development on the former Tyrrell F1 site is acceptable, in principle, in place of the built and permitted industrial development.

The Council’s most recent Land Availability Assessment (LAA) February 2016 cannot be any clearer in terms of the credibility of the omission site when it states that, ‘Provision of new homes here would help towards meeting the housing number in the Local Plan and contribute towards achieving sustainable, inclusive and mixed communities’ Additionally, the LAA concludes by stating that, ‘This site is most suited for residential development, to provide new homes to help meet the identified need.’

The Proposed Submission Local Plan ‘Vision’ and the Foreword drafted by the Council Leader make it abundantly clear that the Proposed Submission Local Plan will promote a ‘brownfield first’ policy approach to housing land identification, and yet despite those stated objectives and the clear support provided in the LAA, this brownfield former industrial site has not been identified for housing development.

Moreover, the activated planning permission on the omission site means that industrial uses could be greatly intensified (together with associated HGVs and service vehicles) without the need for fresh planning permission. Such a scenario would not be in the best interests of the local amenities or the rural environs.

In light of all of the above, it is abundantly clear that the former Tyrrell F1 site at Long Reach is capable of accommodating a modest number of family to help meet the acute and rising demand for new housing, and in so doing ensuring that a future industrial occupier does not intensify the established use and generate a greater numbers of HGVs in this quiet rural location. It is highly notable that the intensification of the omission site for industrial purposes can occur without the need for further planning permission.
We are therefore seeking the identification of the former Tyrrell Site, as identified and supported in the LAA (February 2016) for housing purposes. The precise quantum and amount of housing development to be subject to the preparation of site brief.

I would be very grateful if you would confirm that these representations objecting to the omission of a brownfield former industrial site for housing development in the Proposed Submission Local Plan, have been registered and are ‘duly made’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 111111.png (597 KB)
111122.png (96 KB)

Comment ID: PSLPA16/3758  Respondent: 15626881 / Mariah Mills  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

Housing numbers:  
Regarding housing numbers the Strategic Housing Market Assessment has given a housing need of 693 per year, this is far too high and is double the figure given just 4 years ago.  
Guildford Borough Council have not given details of how the figures have been calculated, the report is therefore unaccountable so should not be used.  
The SHMA is fundamentally flawed, historical errors have not been corrected, there are issues over student housing requirements and errors in the estimation of homes needed to support growth.  
By contrast the independent report by Guildford Residents Association comes up with a much lower figure of 510.  
All other boroughs have reduced the figure that their SHMA came up with, Guildford have taken the highest number. Why have Guildford not constrained the figure?  
The proposed 14,000 homes is a massive increase on the current housing stock, this is overdevelopment and is unsustainable. No justification has been put forward for such a massive increase in one town.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:  

Comment ID: PSLPS16/7088  Respondent: 15626881 / Mariah Mills  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill Farm:

This massive proposed development will have a huge impact on Burpham, the proposal is to effectively double the size of Burpham. This is a major assault on a village area on the outskirts of town. Burpham is already congested particularly at peak times, adding to this 2000 houses, a 1000 car park and ride, 2 schools and perhaps a station will add thousands more car movements to an already congested road network. The increase in solution is unacceptable.

Gosden Hill is in the Green Belt, the topography of the hill means it is a very visible site when driving on the A3. Development of these green fields will spread the urban sprawl in a very visible manner significantly up the A3.

A large portion of the traffic from this massive site will head towards Guildford via the roads through Burpham, this is already congested and will simply not cope with the increase, moreover the pollution of near stationary cars will blight the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15908  Respondent: 15626881 / Mariah Mills  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport:

The evidence on future traffic conditions which has been provided in the Strategic Highway Assessment Report was produced late and is incomplete. Critical information on congestion has not been given in time to be taken into account in the plan proposals.

The proposed Sustainable Movement Corridor is simple unsound and cannot be delivered due to the narrow roads and pinch points on an already very congested route through Burpham.

Of further note is that the proposed Gosden Hill development of 2000 houses plus offices, school etc will add significant pressure to the already congested London road and New Inn Lane. The increase in solution and noise is unacceptable.

The phasing of the proposed Gosden Hill development is in advance of proposed improvements to the A3. This makes no sense.

The major transport issues around Guildford need to be resolved before any further development is considered, these include the proposed A3 tunnel, new river crossing, a workable central bus terminal and a rail station at Merrow.
The Green Belt:

The National policy is clear in that it attaches great importance to the nature of the Green Belt.

The Plan does not show evidence of exceptional circumstances to justify why the Green Belt land should be used for strategic development.

Brownfield land needs more consideration, surely the decline in the need for retail space means that houses could be built in the town centre instead of more retail units, student accommodation should be constructed on campus even if higher rise accommodation is used.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7092  Respondent: 15627009 / Alison Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I particularly object to the proposed destruction of ancient woodland at Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the immense damage it will do to amenity and the rural character of the area from Guildford to Effingham and south of Ripley

I object to the tendency it will have to reduce the remaining rural area north of Ripley (which still retains for now a very special and distinct character) into little more than green patch surrounded by development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17927  Respondent: 15627009 / Alison Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the overall scale of development both residential and industrial because of the resulting pressure on infrastructure (road transport, rail, schools etc)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17930  Respondent: 15627009 / Alison Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In addition I object specifically to the removal from the Green Belt of 100 acres of ancient woodland, and the damage this will have to the integrity of the rural area and the destruction of ancient woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15926  Respondent: 15627009 / Alison Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in principal to the lack of protection of the Green Belt. It was created with great foresight for a purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17929  Respondent: 15627009 / Alison Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in principle to the removal of areas from the Green Belt, and note that the areas to be cut out of the Green Belt include some of the most attractive villages in North Surrey, most obviously East Clandon, which together with Hatchlands and West Horsley place form an area of unique character and beauty in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15925  Respondent: 15627009 / Alison Morrison  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to the number of houses proposed. 13,860 houses will have a devastating effect on local communities. In an already traffic sensitive area due to the situation near the junction of A 3 and M 25 and with no train station or frequent bus service, the increase in use of cars would not only result in further congestion but also in severe air pollution in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of the Horsleys, Ockham, Ripley and Send.

I object to the proposals relating to number, density and sustainability of new housing in West Horsley. The 385 homes on the four proposed sites are at much higher densities than currently exist within the village and will be totally out of character with the existing mix of different housing styles and layout of the village. For West Horsley this would represent a 35% increase in the number of houses within 3-5 years of a plan being adopted. The home building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking and public transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15929  Respondent: 15627105 / Julia McClung  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

The increased volume of car traffic.

• The congestion this traffic will cause on the narrow rural roads in the Horsleys and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
• The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
• The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
• The lack of suitable public transport. The local rail stations of Horsley and Effingham cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15930  Respondent: 15627105 / Julia McClung  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/ A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15928  Respondent: 15627105 / Julia McClung  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The Green Belt & Countryside Study is flawed and the key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15927  Respondent: 15627105 / Julia McClung  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3764  Respondent: 15627137 / Katie McClung  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of the Horsleys, Ockham, Ripley and Send.

I object to the proposals relating to number, density and sustainability of new housing in West Horsley. The 385 homes on the four proposed sites are at much higher densities than currently exist within the village and will be totally out of character with the existing mix of different housing styles and layout of the village. For West Horsley this would represent a 35% increase in the number of houses within 3-5 years of a plan being adopted. The home building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking and public transport.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7094</th>
<th>Respondent: 15627137 / Katie McClung</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the continued inclusion of a site (the former Wisley Airfield, -now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15933</th>
<th>Respondent: 15627137 / Katie McClung</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---
I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The increased volume of car traffic.

b. The congestion this traffic will cause on the narrow rural roads in the Horsleys and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

c. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

d. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

e. The lack of suitable public transport. The local rail stations of Horsley and Effingham cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15934  Respondent: Katie McClung  Agent: Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The Green Belt & Countryside Study is flawed and the key evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15931   Respondent: 15627137 / Katie McClung  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3767   Respondent: 15627201 / Laurence Dawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

As a past resident and regular visitor to family living in West Horsley, I write to Object to the proposals set out in the above proposed local plan as they affect The Horsleys, Ripley, Send and Ockham.

I strongly object to the proposed removal of West and East Horsley from the green belt. The villages are well into the green Belt, are not adjacent to any non green belt urban areas and it would be incongruous to have Areas of Outstanding Natural Beauty (AONB) within or adjacent to urban areas.

I strongly object to the proposal to add 385 new homes within the parish of West Horsley and further I object to the proposal to build 100 homes in East Horsley close to the railway near to East Horsley Station, but adjacent to parts of West Horsley.
I object to the proposals on the grounds that the villages do not have the infrastructure to service the homes proposed; that is insufficient water, electricity, gas and sewerage. In addition there is no provision for extra school places, at all levels the schools are over subscribed, nor plans to expand medical provision. The current road network is based on roads which remain country lanes, founded in the days of horse and cart, are narrow, without safe pedestrian footpaths and because of the increasing heavy use are even now breaking up.

If Guildford Borough Planning department was of a mind to develop and plan the development of the borough and region in a meaningful and positive way it would start with planning improvements and expansion of the infra structure. If the planning department was a business it would fail as it has not thought through or planned for the development it is proposing. The way it is going about the plan will lead to the Borough trying to develop without sufficient income to service the plans. The proposals do not demand that developers contribute meaningful sums to the infrastructure development.

I object to the plan as the housing density proposed is much higher than anywhere in the parishes and while the parishes do not need more large 4-5 bed houses, but smaller 2-3 , particularly 2 bed maisonettes, and terraced houses so that younger people can live in the area, with green space between the blocks to maintain the garden feel of the parishes. In some locations, perhaps near railway embankments 4-5 floored blocks of flats of interesting design could be built.

It is time that Guildford Borough acknowledged that a good part of the housing need could be met by the development of high rise buildings in the centre of Guildford, such as the railway redevelopment proposals. Other areas are also suitable. As towns develop into cities their centres go up. Centres of the Guildford suburbs could also rise higher to perhaps 5/6 storeys.

I object to the plan as Guildford Borough Council has not demonstrated joined up policies for car parking, access to shopping areas, development of local shopping opportunities rather than their reduction. There has to be access to shops and parking and parking availability to increase footfall. This is necessary while transport locally is geared to the motor car. Busses are like trains they cannot go everywhere so many people will not use them and then they are uneconomic.

I object to the proposed plan for its impact on the green belt and in particular on the Surrey Hills ANOB, which abuts and is part of the parishes of East and West Horsley.

I also object to the plan as there is no or little indication of where the new residents will likely find employment to enable them to live in the new houses planned. The Railways are already at capacity as are the local trunk roads and there is no surplus parking space at any of the local railway stations. As we are likely to continue to use the motorcar for personal transport and with buses rather like trains in that they only travel on limited routes the current plans will increase pollution in the local atmosphere.

These local plan proposals have not been well thought out and must be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I am writing to object to the plans to the insetting of Chilworth and the removal of Green Belt status on grounds of

1. Loss of countryside in the beautiful Tillingbourne valley.
2. Intolerable increase in levels of traffic through small communities.
3. Loss of individual character of Surrey villages

I have been a resident in Chilworth for twenty years, having been attracted here by the specific character of the village, namely a single string of houses lining New Road (A248). This enables wonderful access to walking on many footpaths in the lovely unspoilt countryside along both sides of the Tillingbourne valley, including the Down's link, of which many locals and visitors to the area take full advantage.

The unique character of the village has recently been more widely appreciated with the essential clearing work of the heritage site at the old Gunpowder factory works, around which the village originally sprung up. Much money, time and effort has gone into the reclamation from thick undergrowth of the old works and a newly installed information trail is designed to encourage more visitors to come and enjoy the historical significance of our village, once famous throughout Europe. It really is a picturesque setting alongside the Tillingbourne river, with views to St Martha's hill and church having been opened up. A launch event is scheduled for September.

However, since moving here, I have witnessed a steady increase in the amount of traffic on New Road, which peaks at school dropping off and picking up times due to Chilworth infant school and the Tillingbourne middle school situated at either end of the village, both of which are popular schools locally. This causes long queues through the village. There really is no other way for the traffic to go, apart from along New Road. Due to a programme of infilling over recent years, with the development around Chilworth station and St Thomas's Close among others, the increase in traffic has been inevitable such that new residents complain that Chilworth, once a quiet little village, now has a real traffic problem.

Encouraging more visitors to the old Gunpowder works, though welcomed by the locals many of whom have been involved as volunteers in clearing the area, will further add to this traffic congestion.

The loss of Green Belt protection in the area surrounding Chilworth would be devastating, leading to the possibility of Chilworth being subsumed into Blackheath, Albury, Shalford or Wonersh and an intolerable increase in traffic through these small communities. Each of these villages has it's own specific identity and charm, the loss of which would be seriously detrimental to the overall beauty and attractiveness of the Surrey Hills.

I urge the planners and Guildford Borough Council to reject this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the continued inclusion in the Local Plan of a site (the former Wisley Airfield, - now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

It is clear that development along the lines provided in the Local Plan is completely unsustainable, as well as a betrayal of the whole concept of the Green Belt. Many residents do recognize that there may be a need for a limited amount of additional housing, but the current draft Local Plan is absolutely not the way to address this requirement. There is no alternative but for the Council to revise the housing number down significantly, to amend the Local Plan to make greater use of brownfield/previously used land rather than green field sites (of which there are significant amounts of the former within the Borough), and to propose credible, evidence-based plans for how the sustainability of any development will be achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the lack of coherent proposals relating to schools and medical facilities for the Horsleys.

There is a continuing lack of state primary school places in the Horsleys. The Raleigh School which serves both East and West Horsley is full every year and this has been the situation for many years. Secondary school places are limited in number at the Howard of Effingham School and other secondary schools involve a much longer journey of time and distance from the Horsleys to reach them. Glenesk and Cranmore private schools are well supported by many families living in Guildford and other villages up to 14 miles away. Each of these private schools during term time, receives high volumes of traffic going to and from each school at each end of the school day, on Ockham Road North and the A246 respectively.

Kingston Avenue Medical Centre, serving all of East and West Horsley and areas beyond, is always extremely busy and residents experience difficulty in making appointments. The planned population increase (in excess of Government ONS forecasts) for the borough will require a major extension of the Royal Surrey Hospital to cope.
I object to the lack of coherent proposals relating to waste water infrastructure for the Horsleys. These words receive a mention in Reasoned Justification under Policy I1, but no detail for West Horsley has been found in any of the Local Plan documents, including the Infrastructure Delivery Plan.

There are known sewage overflow problems in the Ockham Road North / Green Lane area.

Thames Water has advised Guildford Borough that the area’s wastewater network is unlikely to be able to support the demand anticipated from all the proposed developments. The foul drainage system from West Horsley to the treatment works north of Ripley will need to be upgraded to cope. Thames Water advises ‘a 2 to 3 years lead-in period’ to install the necessary waste water network and treatment capacity after planning permission for a development is granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15937  Respondent: 15627265 / Rachel McClung  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The words “Roads and Transport Infrastructure” are mentioned in Definitions under Policy I1 (Infrastructure and Delivery), but no detail for West Horsley has been found in any of the Local Plan documents, including the Infrastructure Delivery Plan.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). 5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of the identities of the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate, it is unlikely any additional funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan.

Policy I3 provides that developers “will be expected” to propose and secure travel plans for their developments and contribute to transport arrangements for the able and disabled. Legally, this is meaningless - this proposed policy lacks ‘teeth’ and is unrealistic where development and major housebuilding companies are involved.

I object to poor air quality concerns (Policy I3). The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this area as a result.

Whilst Horsley station has frequent trains to London and Guildford seven days a week, the station car park is normally full on weekdays. An increase in village population will increase pressure on station parking and traffic movements to/from Horsley station, to drop off/ collect travellers to London and school children going to Guildford and Leatherhead.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15935  Respondent: 15627265 / Rachel McClung  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Green Belt (Policy P2)
Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are five legal purposes for Green Belt, and it meets them all:
• To check the unrestricted sprawl of large built up areas
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The Local Plan contains no rational, reasonable or credible justification for building on the Green Belt as proposed. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances, and the Local Plan neither demonstrates, nor discloses, any such exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. It is clear, therefore, that the Green Belt boundaries should NOT be changed, and that this policy is flawed and should be amended.

In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy, 1,332 (97%) were against.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected Green Belt land being used. It is perverse for so much housing to be planned for the Green Belt. Clearly, the Green Belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

I object to the proposed removal of West Horsley from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries, and no exceptional circumstances or other justification is made for this proposal. The Green Belt & Countryside Study is flawed and the Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of new homes in West and East Horsley or neighbouring villages. The number and density of housing proposed is not in keeping with the local area and is therefore against policies within the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposals relating to the number of new houses and the density of such housing.

The housing numbers proposed across the borough are for 13,800 homes over the Plan Period to 2031. This number is too high and unsustainable in Guildford’s villages. The model used to calculate the number has not been seen or the assumptions tested by the Council or any of its officers. It has been, on numerous occasions, shown to be flawed by various third parties. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

In West Horsley, the 385 homes on the four proposed sites are at much higher densities than currently exist within the village and will be totally out of character with the existing mix of different housing styles and layout of the village. For West Horsley this would represent a 35% increase in the number of houses within 3-5 years of a plan being adopted. The home building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking and public transport.

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of the Horsleys, Ockham, Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to site A25 Gosden Hill Farm which is a massive development of 2000 homes in the Green Belt. This will merge Clandon and Burpham and substantially increase traffic on all surrounding roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7107  Respondent: 15627329 / Loraine Crates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to site A35 Wisley Airfield, a 2000 homes development in the Green Belt. This will increase traffic in an already busy location on the A3 junction with Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7103  Respondent: 15627329 / Loraine Crates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the late inclusion of site A43 Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7104</th>
<th>Respondent: 15627329 / Loraine Crates</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I object to site A43a, the on and off ramp at Burnt Common. This will increase through traffic in all surrounding villages of Ripley, Send and Clandon not reduce them.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7105</th>
<th>Respondent: 15627329 / Loraine Crates</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I object to site A45 The Talbot which is in a conservation area.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7108</th>
<th>Respondent: 15627329 / Loraine Crates</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I object to site A57 The Paddocks - 4 traveller pitches in Rose Lane.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Comment ID: PSLPP16/15949  Respondent: 15627329 / Loraine Crates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the increased risk of accidents and deaths caused by increased traffic
2. I object to the congestion caused on the A3 and M25 trunk roads
3. I object to the increased congestion on the local village roads and lanes
4. I object to the unsuitability of our local roads for heavy vehicles and more traffic
5. I object to the lack of proper infrastructure planning/capacity for sites

I object to the additional demands made on already overstretched local healthcare facilities

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15948  Respondent: 15627329 / Loraine Crates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any further degradation of roads caused by increased traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15947  Respondent: 15627329 / Loraine Crates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to all erosion of the Green Belt
I object to any "in-setting" of any villages including Ripley, Send and Send Marsh/Burnt Common from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15950</th>
<th>Respondent: 15627329 / Loraine Crates</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. I object to the increased demands on schools places</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. I object to the parking issues in local villages caused by larger population</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to sites being planned in unsustainable locations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15951</th>
<th>Respondent: 15627329 / Loraine Crates</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to new sites being included with less than 2 weeks notice.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3770</th>
<th>Respondent: 15627393 / Brandon White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3771</th>
<th>Respondent: 15627393 / Brandon White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7112</th>
<th>Respondent: 15627393 / Brandon White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7111</th>
<th>Respondent: 15627393 / Brandon White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be at a standstill all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15954</th>
<th>Respondent: 15627393 / Brandon White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15953</th>
<th>Respondent: 15627393 / Brandon White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary space between Woking and Guildford.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15956</th>
<th>Respondent: 15627393 / Brandon White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15955</th>
<th>Respondent: 15627393 / Brandon White</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3776</th>
<th>Respondent:</th>
<th>15627777 / Monica Simpson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Horsley is a rural village NOT a District Centre, and everything is at overload at present.

The planned development on WIsley Airfield, Ockham, frightens everyone to death, because although the original drawings are all very ‘Pretty’ with doctors surgeries, schools, shops etc, we all know that these will be the last to be built …..and may not be built at all…..and the pressure on the nearby village of Horsley will be huge.

Small developments of 100 or so houses in available land in West and East Horsley, will build up to be a vast new influx of people, and the village just cannot cope unless assurances are given to improve and enlarge the infrastructure of our very special village.

I have been a resident of Woodland Drive for 44 years and the qualities I cherished back in 1972 are still appropriate today. Plenty of nearby countryside and fields and walks, yet a good train service to London and Guildford.

Please don’t ruin our Area. Future generations have the right to enjoy the beauty and uniqueness of this village in the years to come. IF YOU STOP YOUR PLANS TO ENLARGE DEVELOPMENT TO THE UNACCEPTABLE LEVEL YOU ARE PROPOSEING, THEN Horsley will remain largely as it is, and we have, by objecting, secured it’s future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3779</th>
<th>Respondent:</th>
<th>15627809 / Fazia Cater</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I'm writing to object about the local plan to expand Guildford by a quarter.

The proposal for expansion appears to be based on questionable and exaggerated evidence (see GRA report on housing). Why can't there be more student accommodation on campus?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15960  Respondent: 15627809 / Fazia Cater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport requirements arising from an expansion have also not been thought through, and nor have existing transport problems been addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15961  Respondent: 15627809 / Fazia Cater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan is not ready for an inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport

County council officers continue to work with borough officers, as well as with Highways England and potential developers, on transport matters. This includes transport impact assessment work and identifying mitigation measures to address the transport impacts of development proposed in the Local Plan.

The county council’s highway assessment work indicates that the schemes which are included in the Department for Transport’s Road Investment Strategy March 2015 and identified in the Infrastructure Schedule (Appendix C) are essential to mitigate the impact of the development proposals set out in the Guildford borough Proposed Submission Local Plan. Without such investment, the cumulative impacts of the new development proposed on the Local Plan’s strategic sites on the Strategic Route Network (SRN) could be considered “severe” in the context of the NPPF, as the additional pressure on the SRN is likely to generate safety issues.

The Infrastructure Schedule also identifies a number of new transport infrastructure projects. As these projects are developed and further details regarding their land requirements are known, appropriate action will need to be taken to safeguard the land to allow these projects to be implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

APPENDIX C Infrastructure Schedule

Strategic Road Network

Page 278 – re SRN4, SRN9, SRN10

For those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council should be deleted from the "Delivered by" column.

Local Road Network
The new signalised junction from Blackwell Farm site to A31 Farnham Road, would be a Section 278 Agreement, delivered in its entirety by the developer. Surrey County Council should be deleted from the "Delivered by" column.

Local Road Network

Page 280 – re LRN3, LRN4, LRN5, LRN6, LRN7, LRN8,

For those elements of infrastructure that are entirely the responsibility of a given developer, Surrey County Council should be deleted from the "Delivered by" column.

Bus Transport

Page 287

Under BT2, Surrey County Council should be deleted from the "Delivered by" column.

We suggest the inclusion two additional BT infrastructure entries relating to the need to provide significant bus networks serving the two east and west urban extensions.

Active Modes

Page 288

We suggest the inclusion of two additional AM infrastructure entries relating to the need to provide significant cycle and pedestrian permeability improvements linking these extensions into the existing urban fabric.

OS Open Space

Page 298

We do not consider it appropriate to deal with school playing fields under Open Space. Public access to the playing fields at Gosden Hill will need to be controlled for security and operational reasons.

PED Primary Schools

Page 299

PED1

Re Expansion of Wyke Primary School by 1 additional FE, please add: “OR RELOCATION OF THE SCHOOL ONTO THE STRATEGIC SITE”

Page 300

PED6

Re Ash Grange in the column headed “Delivered when” delete from years 0-5 to Years and add 1 – 10

SED Secondary Schools

SED1

Under the column headed “Infrastructure Type Infrastructure Project”, the reference in the first sentence to “maxim 6 FE” needs to be amended to state: “up to 7 FE”.

890
To be consistent with the other entries, in the column headed “likely cost and funding source,” please delete: “Developer contributions (from other sites) to fund building”.

It is suggested that wording is added to say that the shared community use of the school playing fields will be secured by a legal agreement.

Page 301

SED2

Under the column headed Infrastructure Type Infrastructure Project, please remove the words: “(to age 16)” to facilitate flexibility for future provision.

In the column headed “likely cost and funding source” please amend the first entry to read: “Developer to provide serviced land at nil cost and transfer it to SCC.”

SED3

In the column headed “Infrastructure Type Infrastructure Project”, the reference in the first sentence to an “A 7- form entry (7FE) secondary school” needs to be amended to “up to 8 FE to” be consistent with the penultimate bullet point under “Allocation” in Policy A46.

In the column headed “likely cost and funding source”, after the words “...including Blackwell Farm strategic site” we would suggest that the following words are added:

“and the site allocation comprising land to the South and East of Ash and Tongham.”

In the column headed “likely cost and funding source”, please amend the first entry to read: “Developer to provide serviced land at nil cost and transfer it to SCC.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3788</th>
<th>Respondent:</th>
<th>15629025 / Surrey County Council (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Sites

Key Evidence Page 122

Strategic Transport Assessment should be included as one of the elements of Key Evidence used in determining the acceptability or otherwise of the Site Allocations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Key Diagram Page 18

The proposed Guildford East (Merrow Station) is notated incorrectly as West Clandon. Effingham Junction station has no notation although it is an existing station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy A10

Land for sustainable movement corridor Town Centre Phase 2, off Walnut Tree Close Page 147

In the 2003 Local Plan under Policy M7 (Access from Walnut Tree Close to Guildford Station) a scheme involved the Safeguarding of part of Walnut Tree Close. This no longer needs safeguarding for the reasons envisaged. However, some of the safeguarded land comprising the West/East alignment of the corridor may be needed for future operational purposes, for whatever schemes goes forward in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A11

Guildford Car Park, Guildford Park Road Page 149

Under “Requirements”, we would like to see included within the second bullet point: “Potential route for the Sustainable Movement corridor”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy A24

Slyfield Area Regeneration Project Page 175 - 176

There is no direct, or indirect reference to Clay Lane under this policy, even the southern element, which uses a substantial part of this site. Even though SARP may not be reliant upon the full link road going through, the northern part of the allocated site does include the southern network of roads/roundabouts forming the Phase 1 of the Clay Lane scheme.

Under “Requirements”, it may be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the existing urban fabric of Guildford, in accordance with the Sustainable Movement Corridor scheme objectives. This could be referenced in the context of a justification for the developer contribution referred to under the third bullet point.

Surrey County Council’s education assessment finds that development of this site will require a new primary school. It is assumed that this is not referenced in Policy A24 because it is considered that Weyfield Primary School would be expanded to meet the need generated by the new development, given the proximity of the existing school to the site. This would be the preferred option, rather than building a new school which would compete with Weyfield. The school would need to expand by 1-2 forms of entry and a decision to take this option forward is dependent on the outcome of detailed feasibility studies that are being undertaken. If these find that it is not feasible to expand the school, additional land might be required.
to be allocated within the SARP area, in addition to a developer contribution. This reflects discussions between officers of our councils.

In the table headed Description under key considerations, the fact that some 11 ha of the site is allocated for waste management purposes in the Development Plan for the area (under Policy WD2 of the SWP) should be specifically acknowledged.

Under allocation we would like to see clarification by stating:

New or enhanced waste management facilities including the following facilities:

- Waste transfer station
- Community recycling centre
- Sewage treatment works

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7129  **Respondent:** 15629025 / Surrey County Council (Sir or madam)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Allocation A25

**Gosden Hill Farm Page 178/9**

Under “Requirements”, a bullet point should be included under the heading, “Infrastructure” requiring the provision for extended/new bus services to provide seamless connectivity between the site, the existing eastern suburbs of Guildford, and the town centre (as well as any through journeys that can be provided in the future to the western fringes of the town), unless this will be adequately met by the Sustainable Movement Corridor.

In addition, it may be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the existing urban fabric of Guildford.

To ensure consistency throughout the document, change wording relating to primary schools to accord with the format of Policy A26 Blackwell Farm and Policy A35 Wisley.

Under “Allocation”, within the penultimate bullet point, we would like to see the wording “potentially as a through school” deleted as the organisation of the school will be decided at a later stage.

Under “Requirements,” Infrastructure, we consider that the secondary school site provision should be dealt with under a separate bullet point. Reference should be made under the new bullet point to the dual use of the playing fields which are essential for the school. It should be stated that ownership of the playing fields will be made over to the school and the dual use will be managed by the school according to an appropriate legal deed of covenant.

It would be useful for us to know where the playing fields are to be located.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A26 Blackwell Farm Page 182

The reference to the A31/Down Place access as being the Primary Access should be changed in the column headed “Allocation”, final bullet point, and in the column headed “Requirements,” first and third bullet points. Further assessment work needs to be undertaken to determine the appropriate access strategy. Within a sustainable urban extension, we would want to encourage Guildford town bound movements to be by non-car modes. Whilst the Down Place access provides for vehicular access to the West, towards Winchester, southbound on the A3, to Portsmouth via Down Lane, and eastwards into Guildford town, we would expect A3 London/M25/ east Guildford/Woking traffic, to use the A3 Egerton Road access.

We would further suggest that the Site Allocation plan on page 185 should include the land necessary to provide the access link to the east (i.e. into Egerton Road). According to the current plan, the site is isolated from the east, especially given that the Ancient Woodland provides a barrier between the site and the urban fabric of West Guildford.

Under “Requirements,” fourth bullet point, reference to the need to manage this through-link should also be included in the text.

Under “Requirements,” A bullet point should be considered for inclusion under the heading, “Infrastructure,” requiring the provision for extended/new bus services to provide seamless connectivity between the site; the existing western suburbs of Guildford; the town centre and also any through journeys that can be provided in the future to the eastern fringes of the town. Whilst the provision of the Sustainable Movement Corridor might be considered sufficient, other bus services and routes into the development might also be needed.

Also under “Requirements,” it might be appropriate to refer to the need to provide permeability for pedestrians and cyclists into and from the development, especially from the urban area of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A29

Land to the east of Ash and Tongham Page 190

Under “Requirements,” given the volume of potential new homes, an additional bullet should be included which refers to the existing substandard junction of White Lane with A31 Hogs Back needing to be either improved or closed. Also, the current gap in the central reservation which requires traffic turning into Ash Green from the East to cross the eastbound A31 traffic is inappropriate for any material increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A32 Surrey Police HQ Page 197

Under “Requirements,” an additional bullet should be included to read: “Close rear access to Sandy Lane for vehicular use.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7133  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A35

Land at former Wisley airfield, Ockham Page 203

More detail is required in the column headed, “Requirements” regarding the potential interventions that will be required to address issues on B2215 Ripley High Street. This comprises two slip roads at A247 Send. If the land necessary for these has now been secured, is presumed that there will not be a problem in linking these to Wisley.

Some 17 ha is allocated for waste management use under Policies WD2 & WD5 of the SWP and is also considered suitable for aggregate recycling. The proposed allocation contains no specific waste use allocation other than an allocation for general industrial purposes which could in principle include some suitable, but smaller scale, waste uses (see below).

The county council would wish to see part of the site continue to be allocated specifically for waste management purposes (the county council acknowledges that much less than 17 ha would be required for waste management purposes - perhaps of the order of 5 ha including any necessary environmental buffer). Therefore as waste planning authority, we object to this proposed policy as it involves the loss of this waste management site and is therefore contrary to SWP 2008 Policies WD2 and WD5 and government policy contained in the NPPW. We consider the Plan to be unsound in terms of being positively prepared in that it does not take account of this acknowledged requirement for waste management facilities and the SWP allocation.

In view of the ongoing need for additional waste management capacity in Surrey, including for the recycling of construction and demolition waste, the proposal would prejudice the successful implementation of the SWP by reducing land availability for such uses and limiting flexibility to make adequate strategic provision. As such it will fetter the implementation of the waste hierarchy and undermine the targets included in SMP Core Strategy Policy MC5 for the production of alternative aggregates in Surrey.
The county council is currently in the early stages of preparing a new waste plan that will consider the need for new waste management capacity in the county.

It should be noted that the wording relating to primary school provision in policies A25, A26 and A35 is not consistent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7122  **Respondent:** 15629025 / Surrey County Council (Sir or madam)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A4: Telephone Exchange, Leaple Road, Guildford Page 133

This site would provide an excellent opportunity for use as a bus station, being mid way between Waitrose, the expanded North Street site, and North Street.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7134  **Respondent:** 15629025 / Surrey County Council (Sir or madam)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43

Land at Garlick’s Arch Page 221

Policy A43: Under the column headed “Requirements,” please add the following bullet points:

- “Main vehicular access via a new roundabout on A247 frontage, to also provide fourth arm for proposed A3 on slip.”
- “Permeability/ connectivity for pedestrians/ cyclists to B2215 Portsmouth Road.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy A43a

Land for new north facing slip roads to/from A3 at Send March/Burnt Common Page 224

The site edging should probably be extended to provide the necessary land, including highway land, required for roundabouts on either side of the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPS16/7136  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A44

Land west of Winds Ridge and Send Hill, Send Page 225

Under the column headed “Requirements,” please include the following bullet point: “The junction of Send Hill with Potters Lane needs improving to provide improved visibility.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPS16/7137  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A46

Land to the south of Normandy and north of Flexford Page 229

We note that the site was proposed to be removed from the green belt and safeguarded for potential future development in the previous draft Local Plan. The current version proposes to bring this site forward for development in this plan period to meet Guildford’s housing needs.

Given this position and in the context of our forecast needs for additional school places over the plan period, required to support the proposed new housing to the west of Guildford, it is our view that the option to locate a secondary school here is acceptable, provided that the scale of housing proposed on this site is delivered to meet the need identified in the plan. This would also help to meet sustainable transport objectives, particularly if the scale of housing supports the delivery of the rail connectivity proposals and the station improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7123</th>
<th>Respondent: 15629025 / Surrey County Council (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A6 North Street Page 137

The following comments refer to text included under the heading “Requirements” under the relevant underlined sub headings as follow:

**Bus Interchange** - The principle of re-locating the bus station/ provision of an interchange elsewhere in the town, has not yet been established through the current study which has not yet reported.

**Transport** – We would like to see included as a separate bullet point, “Full assessment, and implementation of mitigation measures to accommodate the increased travel demand from the development, and changes to the town centre network for private traffic, deliveries, and buses.”

**Assessments** - There is a need to include a separate bullet point, “Transport.”

**Key Considerations** - There is a need to include “Transport/infrastructure” as a separate bullet point.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7124  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A8

Land west of Guildford Railway station, Guildford Park Road Page 143

Under “Opportunities” we would like to see included “Provision of a bus / rail interchange on the west side of the railway clear of Guildford Park Road, with other limited facilities”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7125  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A9

77 – 83 Walnut Tree Close

Page 145

Under “Opportunities” we would like to see included “Potential facilitation of/ contribution to Sustainable Movement Corridor”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D3: Historic environment Page 103

We suggest that the section on the historic environment would be better placed within the "Protecting" section, rather than within the “Design” section as heritage management shares many common objectives and practices with other environmental protection policies.

Policy D8 mentions support for "development of the highest design quality”. We consider that this needs to be more clearly defined. Assessment of design quality and aesthetic appeal is of course highly subjective, but we would nevertheless recommend that at least some parameters for outlining a definition for "high quality" would be helpful in the implementation of this policy and suggest that this should be set out either in the supporting text or in an appendix. A possible approach could be for, “highest quality” to be required to satisfy the relevant "architectural interest” requirements that are commonly assessed as part of the Listing process for historic buildings (set out in "Principles of Selection for Listing Buildings", DCMS, 2010).

The "Monitoring Indicators” table outlines that a "heritage asset register” is necessary: The Historic Environment Record can provide much of the necessary data which will be required to compile this and our Heritage Team would welcome the opportunity to assist.

Para 4.6.9

Page 109

We suggest this should be amended to "Developers will fund and deliver some infrastructure themselves....." rather than "Infrastructure providers will fund and deliver...."

Para 4.6.38

Page 117

This refers to “public” open space and yet the designation includes school playing fields to which public access is restricted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15999  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Comment ID: PSLPP16/15994  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We support the introduction to the economy policies which succinctly set out the role of Guildford’s economy and note that it continues to perform well but there are signs that it could lose its competitiveness to other locations. This section clearly sets out the role of the university and the research park. In our comments on the draft Local Plan (July 2014) we stated that it would be helpful if the supporting text were to include more detailed explanation of what the LEP is and how it operates, that the reference to the role of Guildford as a Growth Town in the LEP’s Strategic Economic Plan could be expanded and that the submission version of the Plan could contain information about the recent Growth Deal projects for the area. We feel that the supporting text should be expanded to include reference to these points.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15995  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies E1– E3 Pages 63 - 70

We support these policies. We note the requirement for the provision of between 37,000 and 47,000 sq m of floorspace for B1a and B1b uses and between 4.7 and 5.3 ha land for B1c, B2 and B8 use classes and the designation of seventeen Strategic Employment Sites which will be protected for employment uses. We note that sufficient land has not been identified within the urban area to meet the employment land requirements so it has been necessary to allocate new employment sites. We support the policy for new floorspace to be directed first to Guildford town centre, then to locations within 500m of a public transport interchange and then to Office and Research and Development Strategic Employment Sites. This flexible approach should help ensure existing and future demand is accommodated.

We would however be concerned about the delivery of the economy policies if one or more of the key development sites for employment use were not able to proceed due to transport or other reasons. Policy A25: Gosden Hill Farm, policy A26: Blackwell Farm and policy A35: Land at former Wisley airfield are all important for meeting employment needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15996  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E2

Location for new employment Floorspace Page 67

Reference should be made to the inclusion of suitable waste management facilities as this would reinforce the principle of directing waste facilities first to industrial/employment sites in urban areas in accordance with Policy CW5 of the Surrey Waste Plan 2008 (SWP) which sets out sequential principles for the location of waste management facilities and Policy CW5 which states that "planning permission for development involving the recycling, storage, transfer, materials recovery and processing of waste will be granted on land that is, or has been used, or is allocated in a Local Plan or DPD or has planning permission for industrial or storage purposes". This is particularly relevant to Policy E2, where inclusion of suitable waste management facilities under the heading “Industrial warehousing and storage” would reinforce the SWP principle of directing waste facilities first to industrial/employment sites in urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy E4: Surrey Research Park

Page 74

As stated in the supporting text, the original outline planning permission for the Surrey Research Park includes a restriction limiting use to “research that is complimentary to the activities of the University of Surrey.” To monitor this policy there is a need to include the definition of this term from the original outline planning permission or to define what ‘complimentary to the activities of the University of Surrey’ means in terms of Standard Industrial Classification (SIC) Codes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Specific comments on policies and supporting text Policy E7

Page 85,

The third bullet point for Secondary Shopping Frontage change of use criteria will be difficult to adhere to. A development in itself that results in traffic generation is not a reason not to permit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15998</th>
<th>Respondent: 15629025 / Surrey County Council (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7

Guildford Town Centre Page 85

The third bullet point for Secondary Shopping Frontage change of use criteria will be difficult to adhere to. A development in itself that results in traffic generation is not a reason not to permit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15990</th>
<th>Respondent: 15629025 / Surrey County Council (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Minerals and Waste Planning

The county council supports the references to minerals and waste safeguarding and the inclusion of safeguarded areas and sites on the Policies Map. This supports the implementation of policies in the Surrey Waste Plan 2008 (SWP) and the Surrey Minerals Plan 2011 (SMP).

There are no significant implications in terms of the safeguarding of mineral resources. The proposed new settlement at the former Wisley Airfield (A35) is located within a minerals safeguarding area but it is considered very unlikely that the underlying sharp sand and gravel resource will be worked in future. Nevertheless, should the site be allocated in the Local Plan, the applicant should be required to investigate the potential for prior working before any planning application being submitted.

The county council seeks to encourage the recycling of construction and demolition waste and the use of recycled aggregate as both minimise the use of valuable land won aggregate. As such, we strongly support Policy D2: Sustainable design, construction and energy.

The provision of waste management infrastructure is essential to support a modern economy and needs to be considered alongside housing and employment growth (National Planning Policy for Waste (NPPW) Paragraph 1). It is important, therefore, that the borough council acknowledges in the Plan that waste management facilities are essential infrastructure to support new housing and industry.

The Local Plan should acknowledge that many waste management activities fall within the general industrial class in the Use Classes Order and can be considered to be a B1c, B2 or B8 use and can be located within modern, purpose-designed buildings on industrial estates. This accords with SWP Policy WD2, which states that "planning permission for development involving the recycling, storage, transfer, materials recovery and processing of waste will be granted on land that is, or has been used, or is allocated in a Local Plan or DPD or has planning permission for industrial or storage purposes." The SWP specifically identifies a number of urban sites and industrial estates in Guildford borough as being potential areas for accommodating waste management facilities, but this list is not meant to be exhaustive. We would additionally like to see Policy E2 of the Proposed Submission Local Plan under the heading of, "Industrial, warehousing and storage," make reference to the inclusion of suitable waste management facilities to reinforce the principle of directing waste facilities first to industrial/employment sites in urban areas in accordance with SWP Policy CW5.

An issue of concern for the county council which is not resolved in this version of the Local Plan relates to the potential loss of the allocated waste management site at the former airfield at Wisley. In our response, dated 18 September 2014, to the consultation on the previous Draft Local Plan, we pointed to the SWP allocation of the former airfield for waste management use and also an existing planning permission for a waste management facility. The proposals for Wisley effectively prejudice the implementation of Surrey’s waste strategy as set out in the SWP. We therefore object to this proposed policy and consider the Plan to be unsound in terms of being positively prepared in that it does not take account of the acknowledged requirement for waste management facilities and the SWP allocation.

In addition to these concerns, we have a number of comments relating to specific policies and supporting text as set out in the consultation document and these are included in the Appendix attached to this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Education

Since the previous consultation on the Draft Local Plan: strategy and sites in July 2014, we have been working with borough council officers under the Duty to Cooperate in order to progress the approach to school provision to support the delivery of Guildford’s growth strategy. This liaison is ongoing and both our councils recognise that it is essential to provide additional school places to meet the increased needs that will arise from the new housing proposed in the emerging Local Plan in a sustainable way and in appropriate locations.

The county council’s role in this process has been to respond to options for school sites, presented by the borough council, in accordance with the objective of meeting the additional educational demands based on the evidence of forecasted need produced by the county council’s schools commissioning team. The key criteria for selection were the location of sites, which need to be as close as possible to the residential development they are intended to serve, and the provision of safe and sustainable access for pupils that, where possible, enables alternatives to car travel.

We are concerned about the designation of all school playing fields as open space. It is inferred in paragraph 4.6.38 of the Local Plan that these areas will be accessible to the public, whereas access and shared use of school facilities will need to be strictly controlled for operational and security reasons. Playing fields are considered to constitute an outdoor recreation facility rather than an amenity space with public access. Moreover, it is our view that designating all school playing fields in this way may not allow for future operational development needs to be met through the expansion of schools on their existing sites. This might lead to additional land, potentially in the Green Belt, being required for the provision of future education facilities.

Whilst the National Planning Policy Framework (NPPF) paragraph 74 states that existing playing fields should not be built on, at paragraph 72, it requires local planning authorities to give great weight to the need to expand schools. In addition, playing fields are considered to be appropriately protected already under statute as they cannot be redeveloped without prior consent from the Secretary of State for Education under Section 77 of the School Standards and Framework Act 1998.

We fully accept that the loss of a school playing field should be wholly exceptional as an option of last resort. However, the county council is increasingly required to expand schools to meet the need for additional school places generated by population growth and new development. Such expansions can sometimes only be accommodated by extending a school...
onto part of the playing fields. It is considered that this should be facilitated by the Local Plan rather than imposing a requirement to routinely have to make exceptions to policy for even minor extensions to schools. Therefore, we consider that the presumption against the loss of playing fields should be set against the need to provide essential education infrastructure to reflect the NPPF.

Policy R5 (Protection of Open Space) in the 2003 Guildford Local Plan set out an exception for school playing fields “where the proposed new development meets a legitimate educational need that is appropriately met on the site.” We would like to see a similar exception included in Policy 14: Green and Blue Infrastructure, particularly given that a number of school expansions are identified in the Plan’s Infrastructure Schedule as needed to deliver the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16000  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 14
Page 118

Policy 14 seeks to protect open space from development in accordance with the NPPF. However, whilst NPPF paragraph 74 states that existing playing fields should not be built on, paragraph 72, requires local planning authorities to give great weight to the need to expand schools. We accept the need to protect school playing fields, however, this should be more clearly balanced against the need for education facilities. Policy R5 in the 2003 Guildford Local Plan included an exception for school playing fields “where the proposed new development meets a legitimate educational need that is appropriately met on the site.” We would like to see a similar exception included in Policy 14 Green and Blue Infrastructure, particularly given that a number of school expansions are identified in the Plan’s Infrastructure Schedule as needed to deliver the Plan. It should be noted that permission for school expansion schemes that will significantly impact on school playing fields is only very rarely sought by the county council as a last resort and such proposals require approval from the Secretary of State.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15988  Respondent: 15629025 / Surrey County Council (Sir or madam)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Guildford borough Proposed Submission Local Plan: strategy and sites June 2016**

Thank you for consulting Surrey County Council on the Guildford borough Proposed Submission Local Plan: strategy and sites document. This is an officer response that has been agreed with the Cabinet Member for Environment and Planning.

The county council is committed to ensuring Surrey’s economy remains strong and to maintaining a high quality of life and well being for Surrey residents through economic development and planned growth underpinned by the timely delivery of supporting infrastructure. This is reflected in current partnership working with boroughs and districts through ‘Surrey Future’ and on the recent Surrey Infrastructure Study, which aim to help support the delivery of agreed local plan and economic strategy priorities. The vision and strategy outlined by Guildford Borough Council in its Local Plan is considered to be broadly consistent with this policy position. The Plan sets out the needs of the borough’s residents and the county council acknowledges that balancing the need for housing and employment growth and the need to protect the Green Belt is a matter to be decided locally through the Local Plan.

A key issue for the county council is the implications of the Proposed Submission Local Plan’s policies and proposals for infrastructure, for which the council is the provider, especially education, transport and waste management.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/15993   **Respondent:** 15629025 / Surrey County Council (Sir or madam)   **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

3. Our Vision and ambition Page 18

To be consistent with the core themes of the plan the sixth paragraph of the vision should be changed to ‘Existing high levels of economic prosperity will be maintained, supported and enhanced through the protection of commercial premises and the provision of additional sites and premises ...’ This would be consistent with strategic objective 8 on page 23 ‘To maintain and enhance our role as one of the County’s key employment locations in both a strategic and local context ..’ and the economy policies (section 4.4) which set out policies for a more flexible approach to the change of use of locations outside town centre and key existing employment locations to ensure existing and future economic demand is accommodated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Site Specific Comments: A20

Surrey County Council support the proposed allocation of site A20 (Former Pond Meadow School) and confirm it is available for a minimum of 10 residential units or, if no other SCC operational requirements, solely residential or extra care at an appropriate density for an urban site as determined through the detailed design process.

Previous Site Specific Submissions

All sites previously submitted through the Guildford LAA processes are still considered suitable and available for development, particularly the Countryside Depot (East Horsley) and the land between Oxenden Road and the A331. We encourage GBC to review and positively consider these sites and would welcome the opportunity to discuss further, especially if the housing requirement for the Borough increases. These sites can positively contribute to the OAN (housing numbers) over the plan period, subject to any operational requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Vail Williams is instructed by Surrey County Council (SCC) Property to make representations on the Guildford Borough Council (GBC) Proposed Submission Local Plan, June 2017. Previous engagement with the Local Plan process has included site specific comments, these representations focus on the main strategic issues, but refer to particular sites where referenced.

Spatial Development Strategy (Policy S2)

One of the fundamental changes to the Proposed Submission Local Plan is within Policy S2 relating to the Spatial Development Strategy. This includes both the level of housing provision over the whole plan period and also the annual housing target, which has been staggered to increase over the plan period.

Paragraph 4.1.9a states that the increasing annual target has been staggered due to the “the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of the necessary infrastructure expected
to occur towards the end of the plan period”. Whilst Surrey County Council is fully supportive of delivering necessary infrastructure to support development and local communities, it recognises the necessity to provide sufficient housing to meet the needs of residents within Surrey. The revised phasing of annual housing targets places a greater emphasis on delivery at the end of the plan period, potentially leading to greater need in the short term due to the lower anticipated delivery rates early in the plan. It is considered that options to bring forward planned development earlier within the plan period should be fully explored to seek to provide a consistent level of housing delivery, recognising the National Planning Policy Framework (NPPF) aim to deliver housing especially within the shorter term. This is acknowledged by GBC, including in paragraph 4.1.10 that the phased approach, which is related to assumptions on likely rate of delivery, does “not in any way preclude the earlier delivery of the site where this is sustainable to do so”.

**Economy and Infrastructure**

Associated with the level of housing, is the forecast for economic growth within Guildford Borough., Policy E1, relating to employment needs, sets out the delivery of employment floor space and land over the plan period. As part of sustainable development, as defined by the National Planning Policy Framework (NPPF), the provision of adequate employment land is supported to ensure the three strands of sustainable development can be incorporated within the wider plan objectives.

The Local Plan recognises (paragraph 2.10a) the pressure on existing infrastructure and the importance of providing sufficient infrastructure to support new development and the local community, which SCC Property support

**Environment**

Surrey County Council recognises the benefit of the countryside, including its uses for recreation. The protection of Areas of Outstanding Natural Beauty, Areas of Great Landscape Values, the Greenbelt, and the Special Protection Areas is supported, in accordance with current national guidance.

**Summary**

In conclusion, the plan seeks to balance housing delivery, economic development and the protection of the environment to accord with national guidance. However, appropriate consideration needs to be given to the wider housing market area.

SCC property support much needed housing and infrastructure development within the Borough and have particular site specific comments as above.

We welcome the opportunity to discuss any issues further, including any details relating to SCC sites that have previously been provided to Guildford Borough Council. Please ensure we are kept informed of all progress of the Local Plan and we request a place at the Examination.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/7141  **Respondent:** 15629377 / The Woodland Trust (Jack Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A24</td>
<td>Slyfield Area Regeneration project, Guildford</td>
<td>Slyfield</td>
<td>Mixed use Development</td>
<td>Adjacent</td>
<td>Unnamed ASNW, TQ007520</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7140  Respondent: 15629377 / The Woodland Trust (Jack Taylor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A25</td>
<td>Gosden Hill Farm, Merrow Lane, Guildford</td>
<td>Guildford</td>
<td>Mixed use development</td>
<td>Within</td>
<td>Within Adjacent</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7142  Respondent: 15629377 / The Woodland Trust (Jack Taylor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site Nearest town Development description Woodland adjacent or within?</th>
<th>Development description Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A26</td>
<td>Blackwell Farm, Hogs Back, Guildford Westborough Mixed use Development Adjacent</td>
<td>Strawberry Grove PAWS, SU963497 Dean Bottom ASNW, SU963494 Unnamed ASNW, SU957498</td>
<td></td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/7143  **Respondent:** 15629377 / The Woodland Trust (Jack Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A27

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site Nearest town Development description Woodland adjacent or within?</th>
<th>Development description Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A27</td>
<td>Warren Farm, White Lane, Ash Green Ash Green C3, 58 Homes Adjacent</td>
<td>Unnamed ASNW, SU905492</td>
<td></td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/7144  **Respondent:** 15629377 / The Woodland Trust (Jack Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A28</td>
<td>Land to the East of White Lane, Ash Green</td>
<td>Ash Green</td>
<td>C3, 52 Homes</td>
<td>Adjacent</td>
<td>College Copse ASNW, SU902499</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/7145  **Respondent:** 15629377 / The Woodland Trust (Jack Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
</table>
| A29                   | Land to the South and East of Ash and Tongham | Tongham | C3, 1200 Homes | Adjacent | Jim Wood ASNW, SU895497
Unnamed ASNW, SU893500
Unnamed ASNW, SU904504 |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/7146  **Respondent:** 15629377 / The Woodland Trust (Jack Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A32
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A32</td>
<td>Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford</td>
<td>Guildford</td>
<td>C3, 116 Homes</td>
<td>Adjacent</td>
<td>Unnamed ASNW, SU990479 Piccard’s Rough ASNW, SU987480</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7147</th>
<th>Respondent: 15629377 / The Woodland Trust (Jack Taylor)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A33</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A33</td>
<td>The University of Law, Guildford</td>
<td>Guildford</td>
<td>Student Accomodation</td>
<td>Adjacent</td>
<td>Unnamed ASNW, SU989482</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/7148 | Respondent: 15629377 / The Woodland Trust (Jack Taylor) | Agent: |
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A35</td>
<td>Land at Former Ockham Airfield, Wisley</td>
<td>Ockham</td>
<td>Residential lead Mixed use development</td>
<td>Adjacent</td>
<td>Unnamed ASNW, TQ065576 Hunt’s Copse ASNW, TQ080577</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A39</td>
<td>Land Near Horsley Railway Station, Ockham Road North, East Horsley</td>
<td>East Horsley</td>
<td>C3, 100 homes</td>
<td>Adjacent</td>
<td>Lollesworth wood ASNW, TQ088543</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A41</td>
<td>Land to the south of West Horsley</td>
<td>West Horsley</td>
<td>C3 90 homes</td>
<td>Adjacent</td>
<td>Lollesworth Wood ASNW, TQ085541</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A43</td>
<td>Land at Garlic’s Arch, Send Marsh/ Burnt common and Ripley</td>
<td>Send</td>
<td>Mixed use-C3, B1c, B2, B8</td>
<td>Within</td>
<td>Garlic’s Arch ASNW, TQ042551 Unnamed ASNW, TQ045552 Oldland’s Copse, TQ045550</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: PSLPS16/7155  Respondent: 15629377 / The Woodland Trust (Jack Taylor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A43a</td>
<td>Land for new North facing slip roads to/from A3 at Send Marsh/Burnt Common</td>
<td>Send</td>
<td>“These sites are allocated for a new northbound on-slip to the A3 trunk road from A247 Clordon Road and a new southbound off-slip from the A3 trunk road to A247 Clordon Road.”</td>
<td>Within</td>
<td>Oldland’s Copse, TQ045548</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7153  Respondent: 15629377 / The Woodland Trust (Jack Taylor)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A46</td>
<td>Land to the South of Normandy and North of Flexford</td>
<td>Flexford</td>
<td>Residential Lead mixed use development</td>
<td>Within</td>
<td>Walden’s Copse ASNW, SU926510 Pussey’s Copse ASNW, SU929505 Unnamed ASNW, SU927506</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/7154  **Respondent:** 15629377 / The Woodland Trust (Jack Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Site reference number</th>
<th>Name of site</th>
<th>Nearest town</th>
<th>Development description</th>
<th>Woodland adjacent or within?</th>
<th>Type of woodland affected (e.g. ASNW, PAWS, secondary) &amp; grid reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>A50</td>
<td>Land at Whittle’s Drive, Aldershot Road, Normandy</td>
<td>Normandy</td>
<td>“The site is allocated for approximately 14 Travelling Showpeople plots (sui generis)”</td>
<td>Adjacent</td>
<td>Unnamed ASNW, SU942525 Island Copse PAWS, SU943526</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16003  **Respondent:** 15629377 / The Woodland Trust (Jack Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
The Woodland Trust appreciates the opportunity to comment on the Guildford borough Proposed Submission Local Plan: strategy and sites.

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own over 1,250 sites across the UK, covering around 23,000 hectares (57,000 acres) and we have 500,000 members and supporters.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.

The Woodland Trust is concerned about a number of site allocations included in the Guildford borough Proposed Submission Local Plan: strategy and sites as they could lead to the damage and loss of ancient woodland. The Trust objects to the inclusion of ancient woodland within these allocated sites; a list of the sites of concern is included at the end of the document.

Planning policy

National Planning Policy Framework (NPPF) paragraph 118 states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."

Natural England’s standing advice for Ancient Woodland and Veteran Trees (published April 2014), paragraph 4.8.1 states: ‘Ancient woodland is of prime ecological and landscape importance, providing a vital part of a rich and diverse countryside. In particular, ancient woodland:

• is exceptionally rich in wildlife, and supports many rare and threatened species;
• may contain surviving descendants and features from the original natural forests;
• acts as reservoirs from which wildlife can spread into new woodlands;
• has valuable soils due to their undisturbed nature;
• is an integral part of England’s historic landscapes and the biological and visual functioning of a landscape;
• contains a wealth of features of historical and archaeological importance little altered by modern cultivation or disturbance;
• contributes to people’s sense of place and imagination.’

Keepers of Time, a statement of Policy for England’s Ancient and Native woodland jointly written by Defra and the Forestry Commission states that “the existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland.” One of the objectives set out in Keepers of Time is to “take steps to avoid losses of ancient woodland and of ancient and veteran trees and to sustain the total extent of other native woodland (ensuring that gains exceed losses).”

The Government Forestry & Woodlands Policy Statement (2013) confirms the Government’s commitment to Keepers of Time. Keepers of Time recognises a number of threats to ancient woodland, making specific reference to the threat posed by development pressures:
‘There are still occasions where native and ancient woodland is threatened by development, and many woods suffer attrition through incursions at their boundaries. Even if the woodland itself is protected, it can suffer serious disturbance where houses or roads are built right up to its margins, both directly from the impact of development, or indirectly through changes to drainage.’

**Impacts on ancient woodland**

Approximately one quarter of priority UK BAP species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.

Development within ancient woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles. Majorly adverse impacts occur as a result of the removal of large areas of woodland to make way for new development.

Furthermore development adjacent to ancient woodland results in more intensive land use, meaning that plant and animal populations are exposed to environmental impacts from outside of the woodland. In particular, the habitats will become more vulnerable to the outside influences, or edge effects, that result from the adjacent land’s change of use. Detrimental edge effects can result in changes to the environmental conditions within ancient woodland, consequently affecting the wood’s stable conditions. Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges.

As part of the Proposed Submission Local Plan, Guildford Borough Council has outlined areas for future development. As indicated by the table included at the end of the document there are areas of ancient woodland included within sites allocated for future development. The Trust is concerned that the large number of ancient woods that have been included within sites for future development leaves these woods open to potential damage and loss.

Creation of new areas of woodland or buffer zones around semi-natural habitats, and more particularly ancient woodland, will help to reduce and ameliorate the impact of damaging edge effects, serving to improve their sustainability. The size of the buffer is dependent on the intensity of land use in the intervening matrix between ancient woods.

Natural England’s standing advice for Ancient Woodland and Veteran Trees, paragraph 6.4, highlights the importance of keeping development away from ancient woodland and buffering it where necessary:

“Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and the type of development. In a planning case in West Sussex the Secretary of State supported the arguments for a 15m buffer around the affected ancient woodland, but larger buffers may be required.”

The size of a number of the site allocations suggests that large scale development could potentially take place. The minimum 15m buffer recommendation to all development is not effective in ensuring that ancient woodland within and/or adjacent to site allocations is not affected by potential future development. Buffers should be constructed on a case-by-case basis rather than a ‘one size fits all’ approach. The Trust recommends that 15m is an absolute minimum and only suitable for small developments; larger buffers should be sought at every opportunity.

**Conclusion**

The Trust is concerned about the potentially adverse impacts that the proposed site allocations will have in relation to areas of ancient woodland within and/or adjacent to site allocations. Ancient woodland is irreplaceable; once lost it cannot be re-created. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development.

The Woodland Trust objects to the inclusion of the below site allocations in the Guildford borough Proposed Submission Local Plan as they are likely to cause damage and/or loss to areas of ancient woodland within or adjacent to their boundaries. For this reason we believe the sites in the table below are unsound and should not be taken forward.
Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

We hope you find our comments to be of use to you. The Woodland Trust is happy to provide any additional information or support regarding the protection of ancient woodland.

If you require any further information regarding points raised within this document, then please do not hesitate to contact us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/3793  **Respondent:** 15629633 / Wokingham Borough Council (Clare Thurston)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

**Background**

Guildford Borough Council is consulting on their Proposed Submission Local Plan: Strategy and Sites from 6 June until 18 July 2016.

This is the first document with the purpose of setting the vision, aims and strategy for the Borough up to 2033. Following adoption of this, a second document will be produced on development management policies.

Wokingham Borough Council responded to Guildford Borough at the Draft Options consultation stage in September 2014. At that stage, a draft Strategic Housing Market Assessment (SHMA) was available indicating that Guildford Borough lies within the West Surrey housing market area. This only gave a draft indication of housing need (of between 650 and 780 dwellings per annum) for Guildford Borough. The main concern of Wokingham Borough Council previously has been whether Guildford Borough Council could release enough land (including potentially from the Green Belt) to meet its housing need.

**Analysis of Issues**

Since the Draft Options consultation stage, the final West Surrey Strategic Housing Market Assessment (SHMA) has been published (in October 2015). This indicates that Guildford Borough lies within the West Surrey housing market area with the boroughs of Woking and Waverley. The SHMA recognised there is a strong relationship between West Surrey housing market area and that covering the Blackwater Valley (centred upon the authorities of Surrey Heath Borough, Rushmoor Borough and Hart District). Therefore, the Blackwater Valley housing market separates Wokingham Borough from the one which includes Guildford Borough. However, it is still important for Wokingham Borough Council to ascertain whether the West Surrey HMA is seeking to meet need within the HMA, as it may have implications for the Wokingham Housing Market Area if they do not.

The final objectively assessed housing need (OAN) for Guildford Borough is 619 dwellings per annum between 2013 and 2033, which gives an overall need of 12,380 dwellings over the 20 year period. (This considerable change between the draft
and final housing need figures is due to the Government’s 2012 Household Projections being published during this time between.

The plan seeks to allocate six strategic sites. This includes taking 1.6% of the Green Belt land in the Borough out of the Green Belt and allocating this for development. Overall the plan makes provision for 13,860 new homes, which will meet the housing need for the Borough.

Wokingham Borough Council is therefore satisfied that on the basis of available information that Guildford Borough Council are planning to meet the need for the Borough, but would welcome further understanding of discussions with Woking and Waverley Borough Councils regarding the meeting of the housing need as an HMA.

OUTCOME / BENEFITS TO THE COMMUNITY

That development proposed through the Guildford Borough Local Plan has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/3481</th>
<th>Respondent:</th>
<th>15629633 / Wokingham Borough Council (Clare Thurston)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

That development proposed through the Guildford Borough Council Proposed Submission Local Plan document has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

Wokingham Borough Council submit an objection to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites document on the basis of:
1. Failure under the duty to cooperate to achieve the necessary cooperation on the strategic cross boundary matter of meeting housing needs.
2. Failure of the plan to consider the likely unmet need arising from elsewhere in the Housing Market Area.

Wokingham Borough Council had previously responded to Guildford Borough Council’s Proposed Submission consultation stage of their Local Plan: Strategy and Sites. At that stage Guildford had finalised the West Surrey Strategic Housing Market Assessment (SHMA), had an identified housing need and had planned to meet this need within the borough. Guildford are now running a further Proposed Submission consultation, following key changes to policies which were deemed to be significant, rather than merely minor modifications. Guildford are still planning to meet their housing need, however there are concerns regarding further unmet need within the West Surrey HMA and beyond.

The report outlines Wokingham Borough Council’s concern regarding likely unmet housing need arising from Woking Borough and Surrey Heath Borough Councils, which is not appropriately dealt with in the plan.

Background

Guildford Borough Council previously consulted on their Proposed Submission Local Plan: Strategy and Sites from 6 June until 18 July 2016. This Strategy and Sites document is the first document of two, which sets the vision, aims and strategy for the Borough up to 2033. Following adoption of this, a second document will be produced on development management
policies. In October 2015 the West Surrey Strategic Housing Market Assessment (SHMA) was published. This indicated that Guildford Borough lies within the West Surrey housing market area with the boroughs of Woking and Waverley.

The SHMA recognised there is a strong relationship between West Surrey housing market area and that covering the Blackwater Valley (centred upon the authorities of Surrey Heath Borough, Rushmoor Borough and Hart District). Therefore, the Blackwater Valley housing market separates Wokingham Borough from the one which includes Guildford Borough. Guildford Borough Council has now published an update to the Proposed Submission document.

Consultation runs between 9 June and 24 July 2017. This includes policy changes which are deemed to be significant as well as minor modifications. There is also an updated evidence base, which includes an update to the West Surrey SHMA: the Guildford Addendum Report 2017. This SHMA update takes into account the latest population and household projections, mid-year population estimates and the economic projections which have been updated in light of the decision for the UK to leave the European Union. This update identifies a lower Objectively Assessed housing Need for Guildford Borough.

With known issues of unmet housing need in Surrey Heath, it is important for Wokingham Borough Council to ascertain whether the West Surrey HMA is seeking to meet need within the HMA and how the Surrey authorities are engaging given the strong links between their areas.

Analysis of Issues
The update to the West Surrey SHMA: Guildford Addendum Report 2017 identifies a change in housing need in Guildford from 13,860 new homes 2013 to 2033, to 12,426 new homes 2015 to 2034. The Guildford Proposed Submission Local Plan demonstrates that Guildford Borough Council will meet its entire proposed housing requirement of the plan period. The Strategic Housing and Economic Land Availability Assessment (SHELAA) identifies provision for delivery of 13,581 new homes, giving a 1,155 buffer to allow flexibility for delivery. Guildford state that this buffer cannot be used to meet unmet need in other areas.

Guildford Borough is within an HMA with Waverley and Woking Boroughs. Waverley Borough Council propose through their new local plan to meet their own housing need within the borough. Woking are currently unable to meet their housing need, with an existing shortfall of 3,150 homes 2013 to 2027. Woking are currently undertaking a Site Allocations DPD, however this has been delayed and creates uncertainty as to whether housing need will be met within the borough. Guildford Borough Council state in their Duty to Cooperate Statement that they have not been formally asked by Woking to accommodate any unmet need.

Failure to accommodate unmet need in the West Surrey HMA means that neighbouring authorities may have to consider delivering further new homes. To the north is the HMA consisting of Hart, Rushmoor and Surrey Heath Borough Councils. It is known that Surrey Heath have indicated that they are unable to meet their housing need and Hart and Rushmoor Borough Councils are only proposing to meet their own housing needs.

It is evidence that unmet housing need may arise from the Western Surrey HMA, and the adjoining Hart, Rushmoor and Surrey Heath HMA to which there are strong links. Seeking positive opportunities to meet needs in full is a central element of the National Planning Policy Framework (NPPF).

Notwithstanding the Guildford Proposed Submission Local Plan seeking to meet the housing needs arising from their authority’s areas, the plan does not consider the likelihood of unmet needs from elsewhere in the HMA, specifically Woking. Further it does not consider the unmet need arising from the adjoining HMA from Surrey Heath Borough Council. This is a major failing of the plan itself and in the outcome of engagement between the three authorities in the HMA.

Notwithstanding the above, Guildford Borough Council should also be mindful of the White Paper “Fixing our broken housing market” (February 2017) which proposes a standardised methodology for assessing housing needs. It will be
necessary for Guildford Borough Council and the other authorities within the HMA to reconsider the level of housing need in the near future.

In summary, although Guildford Borough Council intend to meet the contribution to wider housing needs the needs of the wider HMA are not addressed. In light of this it is not considered that the Duty to Cooperate has been complied with or that the plan is justified and effective, the result being that it is unsound. Guildford Borough Council should work with Waverley and Woking Boroughs to positively seek opportunities to meet development needs in full.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION
The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in excess of £20m over the next three years and all Executive decisions should be made in this context.

How much will it Cost/ (Save)
Is there sufficient funding – if not quantify the Shortfall N/A
Revenue or Capital? N/A
Current Financial Year (Year 1) N/A

Next Financial Year (Year 2) N/A
Following Financial Year (Year 3) N/A

Cross-Council Implications (how does this decision impact on other Council services, including property and priorities?)

Decisions in Guildford Borough Council regarding meeting housing needs, including unmet housing need across the HMA could lead to pressures to deliver housing elsewhere. This could affect the housing targets of other neighbouring local authorities, and potentially WBC.

SUMMARY OF CONSULTATION RESPONSES

Director of Corporate Services.

Monitoring Officer.

Leader of the Council.

Reasons for considering the report in Part 2.

n/a.

List of Background Papers.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We support the presumption in favour of development and the emphasis on positive planning that is embodied in Policy 51.

We support the principle that the housing targets in Policy 52 and Table 1 will not be regarded as a ceiling. However, on that basis we object to the use of very precise targets in Table 1.

We are also concerned that there is an over-reliance upon large housing allocation sites in the planned delivery set out in Table 1.

We support the principle that the housing targets in Policy 52 and Table 1 will not be regarded as a ceiling. However, on that basis we object to the use of very precise targets in Table 1.

We are also concerned that there is an over-reliance upon large housing allocation sites in the planned delivery set out in Table 1.

We object to the 5-unit threshold which is contrary to the recent ministerial statement on affordable housing and the related sections in the NPPG. If the threshold is set at this low level it will actually stifle the supply of smaller residential sites by making them unviable, and will not actually deliver affordable housing.

Similarly, applying a 40% affordable housing quota to small sites will adversely affect their viability.

We recommend that the threshold should be set at 10 units, in line with the ministerial statement and NPPG.

We recommend that a sliding scale is adopted for all sites below 25 units.

We object to the identification of this site as a residential allocation.

The assessment at page 219 of the draft plan identifies it as an 'edge of village/semi-rural location'. We consider that there are more appropriate, less visually prominent, locations within the expanded settlement area of Send where new residential development can be satisfactorily accommodated under Policies 51 and 52.

The allocation of this site should be deleted in favour of organic expansion of Send on sites within the expanded settlement area.

To allow a full discussion of our client's objections and a consideration of alternative residential opportunities in Send.

We object to the identification of this site as a residential allocation.

The assessment at page 225 of the draft plan identifies it as an area which would need 'sensitive design at site boundaries that has significant regard to the transition from village to greenfield'. It is currently a valuable source of informal recreation on the edge of the village, with open views to the west and south.

We consider that there are more appropriate, less visually prominent, locations within the expanded settlement area of Send where new residential development can be satisfactorily accommodated under Policies 51 and 52.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/1779  Respondent: 15630849 / Denton Homes LTD  Agent: Bell Cornwell LLP (Ian Sowerby)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

To ensue that the objections are fully debated in public

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3803  Respondent: 15631105 / Pamela Jacqueline Hagan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed infrastructure schedule (appendix C).

The infrastructure schedule sets out the key requirements that the plan depends on. There is no schedule for Garlick's Arch (A43). This site is, therefore, not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7165  Respondent: 15631105 / Pamela Jacqueline Hagan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
<table>
<thead>
<tr>
<th>Comment ID: PSLP16/16080</th>
<th>Respondent: 15631105 / Pamela Jacqueline Hagan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to new on/off ramps for the A3 planned at Burnt Common (A43). The local roads through Send, Clandon and Old Woking already struggle to cope with the volume of traffic in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLP16/16079</th>
<th>Respondent: 15631105 / Pamela Jacqueline Hagan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the damage to the historic environment as a result of the proposed development (policy D3).

Garlick's Arch (A43) proposal would irrevocably damage the character of the Ancient Woodland which includes 80 ancient oak trees and double the built area in locality.

I object to the Strategic Housing Market Assessment figure of 693 houses per annum in the borough being too high.

This figure has more than doubled a figure of 322 used in previous plans. As the council will not publish the SHMA report and the Plan's proposed growth is based on this, the figure cannot be verified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the employment strategy and impact at Garlick's Arch (A43, policies E2 &E5). There is an existing brown field site at Burnt Common, therefore no need for new industrial sites at Garlick's Arch. There are already 4 long-standing existing sustainable and successful rural businesses in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16074  Respondent: 15631105 / Pamela Jacqueline Hagan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the natural increase in traffic congestion that will be caused by development and will affect our local village roads. The present infrastructure will not support this. (Policy I1)

Our roads in Ripley, Send and Clandon are already overused, in poor repair and often with no footpaths.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16077  Respondent: 15631105 / Pamela Jacqueline Hagan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (policy I1).

Local sewerage, services, utilities, doctors etc. are already close to capacity. There are inadequate infrastructure improvements planned and none planned for Garlick's Arch (A43). There are also no plans to improve the medical, police and emergency services to cover the extra 5000 houses planned in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16078  Respondent: 15631105 / Pamela Jacqueline Hagan  Agent:
I object to poor air quality (policy 13).

The huge changes in development planned in the north east of the borough will particularly to increased congestion and, therefore, a rise in air pollution. This will adversely affect the lives and health of the local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to removing the green belt from its protected status (policy p2). I have extreme concerns for the urban sprawl that this will result in for the villages of Ripley, Send and Clandon. There is already an existing brown field site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to developing areas with risk of flood (policy P4).

National Policy requires adequate account of flood risk: Garlick's Arch (A43) is at higher risk than the council's assessment, this having been classified by the environment agency.

The incidence of flooding has increased considerably in recent years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16073   Respondent: 15631105 / Pamela Jacqueline Hagan   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the local plan: the proposed development is not sustainable (policy S1). The local communities, especially Ripley, Send and Clandon, will be damaged irreparably by the plan for 13,860 new houses which are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16076   Respondent: 15631105 / Pamela Jacqueline Hagan   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2).

GBC's proposal for 13,860 new houses differs from all the other Borough Councils in Surrey. Too much development is planned for the north east of the borough i.e. Wisley (A35), Ripley/Send (A43) and Clandon (A25), namely 36%: this is unbalanced as presently these areas only have 11% of the existing housing within Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16082   Respondent: 15631201 / Harold Young   Agent: 

Answer (if comment is on questions 1-7 of the questionnaire): ()
We are writing to register our objections to the removal of Green Belt Protection from the area around the Villages of Chilworth, Shalford, Peasmarsh and others.

We are not unsympathetic to the need for more housing in this area but we do not agree with the prospect of ‘approved in principal’ as this would appear to relinquish any control over proposed development. We are also not happy that all 3 Villages are lumped together as no longer applicable for Green Belt Protection, whilst other parts of Guildford Borough are unaffected. On what grounds are these particular Villages to be ‘signed out’ for exclusion? Who decides and has anyone looked, in detail at, or visited this area.

If development is permitted, en-bloc, the eventual result would be a continuous built-up area of housing, linking the Villages of Albury, Chilworth, Shalford and Peasmarsh to Guildford Town Centre.

Fresh, new sites bring Applications from large Developers further afield. What we need are small, localised developments on empty Brown Field sites to be used first, using local Developers who are sympathetic to local needs, e.g. affordable housing.

We already have in excess of 500 new homes in Waverley at Cranleigh and there are proposals for using Dunsfold and Wisley as possible new Brown Field sites.

Do we really need more sites? We believe that control must be maintained to preserve our Green Belt; otherwise, parts of the south-east of England will become a concrete jungle.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/3815  **Respondent:** 15631393 / Katie Waple  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The proposal to build 385 new houses will swamp the small village of West Horsley, which in 2011 had 1,111 homes in the Parish. This is a 35% increase. There is insufficient infrastructure in terms of roads, parking, public transport, medical provision, education and schooling, drainage and sewerage. This is contrary to paragraph 47 of the NPPF, which requires local planning authorities set out their own approach to housing density to reflect local circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I wish to object, most strongly, to the Council’s Green Belt policy in relation to the removal of Green Belt land for housing development. In particular I am concerned about the proposed release of the open fields known as Allocation Sites A38, A39, A40 and A41 in West Horsley. My objections are that the Council’s proposal is contrary to Government advice contained within the National Planning Policy Framework 2012;

• Paragraph 79 states that “the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

• Paragraph 82 states that “New Green Belts should only be established in exceptional circumstances”. Therefore if existing Green Belt land is sacrificed for housing, the quantum of Green Belt will reduce and will not be replaced.

• Paragraph 83 provides “Once established, Green Belt boundaries should only be altered in exceptional circumstances. The Council has not demonstrated “exceptional circumstances” but states that the shortage of available housing land is an exceptional circumstance. The problem is that Green Belt land, which is not Previously Developed Land (PDL), should be regarded as sacrosanct and should only be released as a very last resort and after the re-use of Brownfield and PDL has been exhausted. GBC has made no real attempt to survey and review the availability of Brownfield and PDL but, instead, has targeted Green Belt land predominantly in single ownership, as this is easier to deliver. Good town planning is not about easy deliverability and knee-jerk solutions. This is “lazy” planning and should be rejected.

• Paragraph 87 says “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Insufficient “special circumstances” have been advanced by GBC to justify the release of previously undeveloped Green Belt, which still serves its original purpose as Green Belt land.

• The proposal is also contrary to paragraph 88 of the NPPF, which states that exceptional circumstances will not exist unless the harm caused to the Green Belt is outweighed by other considerations. I do not agree that a shortage of housing land is to be considered as an exceptional circumstance but, even if I am wrong, the harm to Green Belt is not outweighed by other considerations.

• Paragraph 89 states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt.
• In summary the proposal to release Green Belt land is contrary to Government advice and there are, in fact, two distinct tests. Firstly GBC has to prove “exceptional circumstances” to change the boundaries of the Green Belt and secondly it has to prove “exceptional circumstances” to justify inappropriate development.

1. There is case law concerning “special circumstances” and, in particular, whether a housing shortage is a “special circumstance” of sufficient weight to justify the release of Green Belt. I list below the relevant synopsis;

• In Hunston Properties Ltd [2013] EWCA Civ 1610; [2014] JPL 599, it was held that;

On the facts, the Inspector was obliged to find a housing shortfall. However, the weight to be given to such a housing shortfall (and whether it constituted ‘very special circumstances’ for the purposes of NPPF 87) was a matter of planning judgment. The weight to be attached to the shortfall may, as a matter of planning judgment, be reduced where a shortfall is inevitable due to a district being subject to policies, which restrict development (such as AONBs, National Parks or Green Belts).

• Further it was held in R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin) that;

“A shortfall in housing land supply can, as a matter of policy, be a very special circumstance, although the occasions when it is likely to suffice by itself to warrant the grant of permission for housing development in the Green Belt are expected to be few and far between”.

• The case of R (Luton Borough Council) v Central Bedfordshire Council [2015] EWCA Civ 537 it was stated that;

“…paras. 87-88 of the NPPF provide guidance regarding the approach to be adopted if there is a proposal for development of an area within the Green Belt set out in a local plan: “very special circumstances” have to be shown. This is a stricter test than that in para. 83 in respect of changing the boundaries of the Green Belt in the local plan.”

As can be seen none of the case law to date supports the development of new housing in the Green Belt.

1. There is no precedent for releasing existing Green Belt land where its original aims and functions are still being met. The original Green Belt legislation and particularly circular 42/55 only envisaged and to a limited scale the “infilling” and “rounding off” within the Green Belt and existing towns and villages should not be allowed to expand any further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The proposal to build 385 new houses will swamp the small village of West Horsley, which in 2011 had 1,111 homes in the Parish. This is a 35% increase. There is insufficient infrastructure in terms of roads, parking, public transport, medical provision, education and schooling, drainage and sewerage. This is contrary to paragraph 47 of the NPPF, which requires local planning authorities set out their own approach to housing density to reflect local circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16087  Respondent: 15631425 / Maria Waple  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I wish to object, most strongly, to the Council’s Green Belt policy in relation to the removal of Green Belt land for housing development. In particular I am concerned about the proposed release of the open fields known as Allocation Sites A38, A39, A40 and A41 in West Horsley. My objections are that the Council’s proposal is contrary to Government advice contained within the National Planning Policy Framework 2012;

- Paragraph 79 states that “the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

- Paragraph 82 states that “New Green Belts should only be established in exceptional circumstances”. Therefore if existing Green Belt land is sacrificed for housing, the quantum of Green Belt will reduce and will not be replaced.

- Paragraph 83 provides “Once established, Green Belt boundaries should only be altered in exceptional circumstances. The Council has not demonstrated “exceptional circumstances” but states that the shortage of available housing land is an exceptional circumstance. The problem is that Green Belt land, which is not Previously Developed Land (PDL), should be regarded as sacrosanct and should only be released as a very last resort and after the re-use of Brownfield and PDL has been exhausted. GBC has made no real attempt to survey and review the availability of Brownfield and PDL but, instead, has targeted Green Belt land predominantly in single ownership, as this is easier to deliver. Good town planning is not about easy deliverability and knee-jerk solutions. This is “lazy” planning and should be rejected.

- Paragraph 87 says “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Insufficient “special circumstances” have been advanced by GBC to justify the release of previously undeveloped Green Belt, which still serves its original purpose as Green Belt land.

- The proposal is also contrary to paragraph 88 of the NPPF, which states that exceptional circumstances will not exist unless the harm caused to the Green Belt is outweighed by other considerations. I do not agree that a shortage of housing land is to be considered as an exceptional circumstance but, even if I am wrong, the harm to Green Belt is not outweighed by other considerations.
• Paragraph 89 states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt.

• In summary the proposal to release Green Belt land is contrary to Government advice and there are, in fact, two distinct tests. Firstly GBC has to prove “exceptional circumstances” to change the boundaries of the Green Belt and secondly it has to prove “exceptional circumstances” to justify inappropriate development.

1. There is case law concerning “special circumstances” and, in particular, whether a housing shortage is a “special circumstance” of sufficient weight to justify the release of Green Belt. I list below the relevant synopsis;

• In Hunston Properties Ltd [2013] EWCA Civ 1610; [2014] JPL 599, it was held that;

  On the facts, the Inspector was obliged to find a housing shortfall. However, the weight to be given to such a housing shortfall (and whether it constituted ‘very special circumstances’ for the purposes of NPPF 87) was a matter of planning judgment. The weight to be attached to the shortfall may, as a matter of planning judgment, be reduced where a shortfall is inevitable due to a district being subject to policies, which restrict development (such as AONBs, National Parks or Green Belts).

  • Further it was held in R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin) that;

    “A shortfall in housing land supply can, as a matter of policy, be a very special circumstance, although the occasions when it is likely to suffice by itself to warrant the grant of permission for housing development in the Green Belt are expected to be few and far between”.

  • The case of R (Luton Borough Council) v Central Bedfordshire Council [2015] EWCA Civ 537 it was stated that;

    “…paras. 87-88 of the NPPF provide guidance regarding the approach to be adopted if there is a proposal for development of an area within the Green Belt set out in a local plan: ‘very special circumstances’ have to be shown. This is a stricter test than that in para. 83 in respect of changing the boundaries of the Green Belt in the local plan.”

As can be seen none of the case law to date supports the development of new housing in the Green Belt.

1. There is no precedent for releasing existing Green Belt land where its original aims and functions are still being met. The original Green Belt legislation and particularly circular 42/55 only envisaged and to a limited scale the “infilling” and “rounding off” within the Green Belt and existing towns and villages should not be allowed to expand any further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/3819  **Respondent:** 15631553 / Anthony Smith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
1. I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3818  Respondent: 15631553 / Anthony Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object that there has not been and demand that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3817  Respondent: 15631553 / Anthony Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by me as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological merit. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16091  Respondent: 15631553 / Anthony Smith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
| Comment ID: PSLPP16/16092 | Respondent: 15631553 / Anthony Smith | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

1. Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16089 | Respondent: 15631553 / Anthony Smith | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

1. Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.
1. Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

2. I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

3. I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16090  Respondent: 15631553 / Anthony Smith  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

1. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16088  Respondent: 15631553 / Anthony Smith  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London. Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1781  Respondent: 15631553 / Anthony Smith  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| 1. I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered. |
| 2. I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan. |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1780  Respondent: 15631553 / Anthony Smith  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
I have lived in Woking for the past 30 plus years and enjoy visiting all the areas named. I find the proposed local plan extremely unwelcome to this area.

I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by my family and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. The proposal to build 385 new houses will swamp the small village of West Horsley, which in 2011 had 1,111 homes in the Parish. This is a 35% increase. There is insufficient infrastructure in terms of roads, parking, public transport, medical provision, education and schooling, drainage and sewerage. This is contrary to paragraph 47 of the NPPF, which requires local planning authorities set out their own approach to housing density to reflect local circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object, most strongly, to the Council’s Green Belt policy in relation to the removal of Green Belt land for housing development. In particular I am concerned about the proposed release of the open fields known as Allocation Sites A38, A39, A40 and A41 in West Horsley. My objections are that the Council’s proposal is contrary to Government advice contained within the National Planning Policy Framework 2012;

- Paragraph 79 states that “the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

- Paragraph 82 states that “New Green Belts should only be established in exceptional circumstances”. Therefore if existing Green Belt land is sacrificed for housing, the quantum of Green Belt will reduce and will not be replaced.

- Paragraph 83 provides “Once established, Green Belt boundaries should only be altered in exceptional circumstances. The Council has not demonstrated “exceptional circumstances” but states that the shortage of available housing land is an exceptional circumstance. The problem is that Green Belt land, which is not Previously Developed Land (PDL), should be regarded as sacrosanct and should only be released as a very last resort and after the re-use of Brownfield and PDL has been exhausted. GBC has made no real attempt to survey and review the availability of Brownfield and PDL but, instead, has targeted Green Belt land predominantly in single ownership, as this is easier to deliver. Good town planning is not about easy deliverability and knee-jerk solutions. This is “lazy” planning and should be rejected.

- Paragraph 87 says “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Insufficient “special circumstances” have been advanced by GBC to justify the release of previously undeveloped Green Belt, which still serves its original purpose as Green Belt land.

- The proposal is also contrary to paragraph 88 of the NPPF, which states that exceptional circumstances will not exist unless the harm caused to the Green Belt is outweighed by other considerations. I do not agree that a shortage of housing land is to be considered as an exceptional circumstance but, even if I am wrong, the harm to Green Belt is not outweighed by other considerations.

- Paragraph 89 states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt.

- In summary the proposal to release Green Belt land is contrary to Government advice and there are, in fact, two distinct tests. Firstly GBC has to prove “exceptional circumstances” to change the boundaries of the Green Belt and secondly it has to prove “exceptional circumstances” to justify inappropriate development.

1. There is case law concerning “special circumstances” and, in particular, whether a housing shortage is a “special circumstance” of sufficient weight to justify the release of Green Belt. I list below the relevant synopsis;

- In Hunston Properties Ltd [2013] EWCA Civ 1610; [2014] JPL 599, it was held that;

On the facts, the Inspector was obliged to find a housing shortfall. However, the weight to be given to such a housing shortfall (and whether it constituted ‘very special circumstances’ for the purposes of NPPF 87) was a matter of planning judgment. The weight to be attached to the shortfall may, as a matter of planning judgment, be reduced where a shortfall is inevitable due to a district being subject to policies, which restrict development (such as AONBs, National Parks or Green Belts).

- Further it was held in R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin) that;

“A shortfall in housing land supply can, as a matter of policy, be a very special circumstance, although the occasions when it is likely to suffice by itself to warrant the grant of permission for housing development in the Green Belt are expected to be few and far between”.

Page 942 of 2988
The case of R (Luton Borough Council) v Central Bedfordshire Council [2015] EWCA Civ 537 it was stated that;

“…paras. 87-88 of the NPPF provide guidance regarding the approach to be adopted if there is a proposal for development of an area within the Green Belt set out in a local plan: “very special circumstances” have to be shown. This is a stricter test than that in para. 83 in respect of changing the boundaries of the Green Belt in the local plan.”

As can be seen none of the case law to date supports the development of new housing in the Green Belt.

1. There is no precedent for releasing existing Green Belt land where its original aims and functions are still being met. The original Green Belt legislation and particularly circular 42/55 only envisaged and to a limited scale the “infilling” and “rounding off” within the Green Belt and existing towns and villages should not be allowed to expand any further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3822     Respondent: 15631873 / Claire Spencer     Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to express my objection to the proposed plan for Horsley.

I do not believe that exceptional circumstances have been demonstrated to remove Horsley from the Green Belt.

No reasons have been given why there would be an extension to the boundaries of the settlement area of the Horsleys.

Our school is already full and doctors is overstretched – roads are too busy with no improvements made which we are already in desperate need of.

Station Parade cannot possibly be classed as a District Centre.

The amount of houses proposed as a percentage for West Horsley is such a vast increase in comparison with other areas.

I think that all brown sites within already urbanised areas should be used first – eg Guildford.

I particularly object to planning site A41 as this cannot be classed as infilling – it is a separate piece of agricultural land that does not adjoin any developed land.

The green belt was put in place for a reason – to keep our country green and help with the pollution – do not destroy this for our children and their children – it is our responsibility to protect the land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As residents of East Horsley we wish to lodge our strong objection to the draft plan. Our objection relates to those policies and proposals of the plan relating to: HOUSING and GREEN BELT and INFRASTRUCTURE.

We have seen the objections lodged by The Horsley Countryside Preservation Society, Horsley Parish Council, Guildford Green Belt Group, WAG and others. Insofar as they relate to these three main aspects of the draft plan we agree with them and support the contention that for the reasons they have advanced these aspects of the plan are fundamentally flawed and should be re-written.

However, it has been reported in Surrey Advertiser Friday 15 July 2016 that Guildford Borough Council (GBC) proposes to carry out a further review of the housing strategy following the UK decision to leave the European Union. Furthermore, objection has been made by others that GBC has failed to make full and proper disclosure of the basis on which the alleged housing need figures have been calculated. It is reported that GL Hearn who carried out the Strategic Housing Assessment have refused to disclose to GBC the assumptions and calculations underlying their conclusions. This is fundamental to the proper scrutiny of the soundness of the Housing and Green Belt proposals of the Draft Plan.

In these circumstances there has been a manifest failure by GBC to present a proper evidence base to support and justify the proposals of the Plan relating to the redrawing of the Green Belt Boundaries or to allow residents to properly scrutinise and understand the basis of the Plan. Without it GBC has itself failed to properly consider whether the proposals of the plan are soundly based. Without the information as to how the housing figures underlying the Housing and Green Belt Plan have been arrived at the legal requirements relating to the preparation of the Plan have not been properly followed and the validity of these related aspect of the Draft Plan, if not the whole Plan, is open to doubt and possible legal challenge in due course.

Paragraph 4.3.13 on the draft Plan contends that there are “exceptional circumstances …in order to facilitate the development that is needed to promote sustainable patterns of development.” Leaving aside site specific objections relating to the potential main development sites, in the circumstances referred to above there is no reliable evidence that the redrawing of Green Belt Boundaries is needed to facilitate sustainable patterns of development.

Given the prospect of a further review and decisions by GBC before the Plan is submitted to the Secretary of State we wish this letter to stand as our formal objection and representation on the draft Plan and to support the reasons lodged by the Parish Councils, the Horsley Preservation Society, Guildford Green Belt Group and WAG for objecting to it. We reserve the right to amend, expand or supplement this objection in detail in due course in the light of the Council’s up to date position before the Plan is submitted for Examination or thereafter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3831</th>
<th>Respondent: 15632289 / Claire Belton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the local plan as a whole, as the Borough has failed to provide proper evidence of the need for such a large amount of housing and for the appropriateness of most of the development.

I believe the Local Plan 2014 lacks valid research and evidence of need; lacks planning for infrastructure improvement already needed without further development of the area; and is being rushed through using the wrong Regulation (19). It must be properly reviewed and consulted fully under the correct Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16111</th>
<th>Respondent: 15632289 / Claire Belton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to removal of Send and other villages from the green belt. This can only be done in exceptional circumstances according to planning law, and none exist in this area. The interests of developers profiting from indiscriminate urban development are not exceptional circumstances.

Any weakening or exceptions to green belt protection will lead to its permanent loss. The green belt must be protected in its entirety, according to current law. It is the lungs of the densely populated south east, and an area that is enjoyed by millions, including valuable tourism from abroad.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16112</th>
<th>Respondent: 15632289 / Claire Belton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Developers must use the many brown-field sites identified in the Borough before any other sites are even considered. Developers (and some Councillors) put profit above every else, leaving the taxpayer to pick up the ongoing bill for inappropriate development and inadequate infrastructure improvement.

We want government at all levels to show vision and innovation in development matters, and to conduct planning with due diligence and integrity, as it is the future of their own families at stake as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1785</th>
<th>Respondent: 15632289 / Claire Belton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Having reviewed the Local Plan I want to express my concerns over many aspects of the development included. I feel the Council has ignored objections residents made in the 2014 consultation, showing a complete lack of consideration for the impact such extensive development will have in the local area.

I object to the Council making substantial last minute changes to the plan, such as the Garlick’s Arch development in Send and the addition of a major alteration/enlargement of the junction on the A3 at Burnt Common. There are also many other significant changes to the 2014 plan. This requires a full consultation under Regulation 18, not the limited consultation under Regulation 19 for minor changes.

I think the brief six week Local Plan consultation, placed in summer when many people are away on holidays, is a deliberate act to limit residents’ opportunity to fully review the extensive documentation comprised in the Plan and to then make any appropriate objections if required.

I object to both these developments on the grounds that there was improper use of Regulation 18; no local consultation; that Garlick’s Arch is green belt land which includes an area of ancient woodland and parts of which are low lying and subject to flooding.

I object to the alteration to the A3 junction at Burnt Common, as it has not been part of a full infrastructure review and proper consultation with local residents. It was added to the plan at the last minute to avoid proper scrutiny.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/2699  Respondent: 15632289 / Claire Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A42 - to the original 45 homes and the increase to 60 homes, on the basis that it is Green-belt and flood-zone land; and that local roads including Tannery Lane and the A247 are narrow and already severely congested. There is a clear agenda to open up this area to development, with a view to increasing these numbers further in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2702  Respondent: 15632289 / Claire Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 - on the grounds that it is Green-belt and development is not permitted. With vacant industrial property in the region, there is no need for further industrial space now or in the foreseeable future. I object to the change of wording to minimum 'to replace maximum of 7000 sq m, as this is a deliberate act to open up our area to unlimited development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1173  Respondent: 15632289 / Claire Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
I object to removal or 'inset' from the Green-belt of Send and other villages throughout the Borough, or sections of land such as Send Business Park (Policy 2 at paragraph 4.3.15). This can only be done in exceptional circumstances, for which none exist. This practice is erosion of the Green-belt by stealth and must not be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/211  Respondent: 15632289 / Claire Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

The Local Plan needs also to take into account the impact of leaving the EU, which at this stage is difficult to assess. It should therefore be put on hold until this process is fully resolved. In the meantime, development should be contained to existing town and brown-field sites, where it is lawful and appropriate. Councillors and other elected representatives at all levels need to look to the long term future and must conduct themselves with honesty and integrity for those they represent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3849  Respondent: 15633217 / Emma Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
I object to the 2016 draft local plan for the following reasons and would like my comments to be seen by the inspector:

I object to Send, Ripley and the surrounding villages being removed from the green belt. Our MP promised to protect the green belt yet the local plan is proposing to remove 15 villages from Green Belt, this is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7253  Respondent: 15633217 / Emma Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plans for Garlicks Arch. Our infrastructure is already struggling with the current occupancy in the area. Our roads are regularly gridlocked, particularly Send Road and Send Marsh Road with the flow of traffic onto the A3, which would only increase with an extra 400 houses and services to the proposed industrial units. Services such as the local schools and doctors are already at full capacity, with it being increasingly difficult to get a doctors appointment even for young children. This issue would only amplify with the proposed developments. Our roads and pavements are already in a state of disrepair and an increase of pedestrians and vehicles will only make this matter worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7254  Respondent: 15633217 / Emma Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed A43a on/off ramp at Burnt Common as again this will only increase the quantity of traffic in the area, which is already struggling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7209  Respondent: 15633217 / Emma Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16145</th>
<th>Respondent: 15633217 / Emma Cooper</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the inclusion of 2 travellers pitches at Send Hill, I can not understand why this would benefit our village in the slightest and why any borough would actively encourage these pitches.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/16254</td>
<td>Respondent: 15633217 / Emma Cooper</td>
<td>Agent:</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the disproportionate amount of development in one area of the borough, our villages will lose their identities and blend into one.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/16253</td>
<td>Respondent: 15633217 / Emma Cooper</td>
<td>Agent:</td>
</tr>
</tbody>
</table>
I object to Send, Ripley and the surrounding villages being removed from the Green Belt. Our MP promised to protect the Green Belt yet the local plan is proposing to remove 15 villages from the Green Belt, this is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1787  Respondent: 15633217 / Emma Cooper  Agent:

I object to the way in which many items of the local plan have been introduced. I do not believe Guildford Borough Council have followed correct process by introducing last minute additions and alterations which warrant a full consultation period not the short cut that it appears to be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3860  Respondent: 15634113 / Joby Lees  Agent:

My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. I live in Guildford but my Sister and her family and my Mother all live in East Horsley. We've all lived in the area for many many years. It is a lovely place to live and we have enjoyed the scenery and the fact that there is so much Green Belt around meaning lovely spaces to enjoy. Even within these areas there has been a population increase over the years with of course an increase of houses cars etc. Which is inevitable. However it
has always been a relief knowing that whatever happens and however many houses are built, the Green Belt is safe and the area will not be destroyed as promised by the Conservative Party.

The Green belt is an integral part of the community. If the planning permission is granted, the environment will be affected with local wildlife, fauna and flora possibly being destroyed for ever. If the houses are built then the population will triple. As the population has grown already the roads and transport has not increased and has not been improved; so the roads which are already poorly kept and constantly full (and don't get me started on the amount cyclists which are already hogging the roads) will get worse and will probably not be maintained or up graded. There is a lack of public transport so more people use their own cars which means generally 2 cars per house which will double quadruple road usage and more traffic jams and hold ups. Water works which are expensive and average will need up grading which will mean higher costs. More sewage works will need to be built which again means higher costs to those that are already paying. The A3 which is already used to capacity will have more traffic causing more traffic jams meaning the commute to work whether going towards London or Guildford will take much longer.

If the planning permission for the Green Belt goes ahead the Area of Natural Beauty which is why most people move here will be completely destroyed. Once gone it's gone for good and we can never get it back.

I vote that we DO NOT go ahead with the building of more houses and buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16188</th>
<th>Respondent: 15634113 / Joby Lees</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If the planning permission for the Green Belt goes ahead the Area of Natural Beauty which is why most people move here will be completely destroyed. Once gone it's gone for good and we can never get it back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16186</th>
<th>Respondent: 15634113 / Joby Lees</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My name is [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. I live in Peaslake. I work in Guildford and drive through Clandon every day to work. We've all lived in the area for many many years. It is a lovely place to live and we have enjoyed the scenery and the fact that there is so much Green Belt around meaning lovely spaces to enjoy. Even within these areas there has been a population increase over the years with of course an increase of houses cars etc. Which is inevitable. However it has always been a relief knowing that whatever happens and however many houses are built, the Green Belt is safe and the area will not be destroyed as promised by the Conservative Party.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16187  Respondent: 15634113 / Joby Lees  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green belt is an integral part of the community. If the planning permission is granted, the environment will be affected with local wildlife, fauna and flora possibly being destroyed for ever. If the houses are built then the population will triple. As the population has grown already the roads and transport has not increased and has not been improved; so the roads which are already poorly kept and constantly full (and don't get me started on the amount cyclists which are already hogging the roads) will get worse and will probably not be maintained or up graded. There is a lack of public transport so more people use their own cars which means generally 2 cars per house which will double quadruple road usage and more traffic jams and hold ups. Water works which are expensive and average will need up grading which will mean higher costs. More sewage works will need to be built which again means higher costs to those that are already paying. The A3 which is already used to capacity will have more traffic causing more traffic jams meaning the commute to work whether going towards London or Guildford will take much longer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3864  Respondent: 15634145 / Annette Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to both Sends removal from the Green Belt, the reason a lot of the local residents have chosen to live in and around sends is because of its green belt and thus it green fields and open spaces. It also provides us with a buffer from both Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7234  Respondent: 15634145 / Annette Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

---

I object to the late inclusion of the A43 Garlicks Arch development as resident of Burnt Common Lane this will have a substantial effect on myself and my family. This development will obviously completely change this small and sleep hamlet of Send and Ripley. One of my main concerns is with regard to flooding. It is also a site with a large amount of ancient woodlands. The industrial development is certainly not needed, and with regarding to the housing it my belief that the housing need for the area has been grossly exaggerated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7235  Respondent: 15634145 / Annette Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

---

I object to the proposed interchange with the A3 at Burnt Common because Send would be need to take the traffic from the proposed Wisley Airfield site and from Gosdon Hill thus causing horrendous traffic jams and nobody getting anywhere quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7236  Respondent: 15634145 / Annette Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of the Travellers pitches at Send Hill as this area is not very accessible being a single tack country road in part.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16200  Respondent: 15634145 / Annette Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am emailing with regards to the proposed Guildford Local Plan to register my objection to this most horrific proposal which sets to destroy a substantial part of our Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16201  Respondent: 15634145 / Annette Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft local plan as the developments proposed are not sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3865  Respondent: 15634177 / John Davies  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to both Sends removal from the Green Belt, the reason a lot of the local residents have chosen to live in and around Send is because of its green belt and thus it green fields and open spaces. It also provides us with a buffer from both Woking and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7237  Respondent: 15634177 / John Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the late inclusion of the A43 Garlicks Arch development as resident of Burnt Common Lane this will have a substantial effect on myself and my family. This development will obviously completely change this small and sleepy hamlet of Send and Ripley. One of my main concerns is with regard to flooding. It is also a site with a large amount of ancient woodlands. The industrial development is certainly not needed, and with regard to the housing it my belief that the housing need for the area has been grossly exaggerated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7238  Respondent: 15634177 / John Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---
I *object* to the proposed interchange with the A3 at Burnt Common because Send would be need to take the traffic from the proposed Wisley Airfield site and from Gosdon Hill thus causing horrendous traffic jams and nobody getting anywhere quickly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7239</th>
<th>Respondent: 15634177 / John Davies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I *object* to the development of the Travellers pitches at Send Hill as this area is not very accessible being a single tack country road in part.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16202</th>
<th>Respondent: 15634177 / John Davies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I *object* to the 2016 Draft local plan as the developments proposed are not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3873</th>
<th>Respondent: 15636289 / Chris Holmes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The annual housing target (13,860 additional homes by 2033) - how has this figure been determined? As a number with no substance behind it (how it has been derived) it is meaningless. I understand there have been several requests for the calculations to be made available with as yet nothing forthcoming from the Council. I am calling for transparency. It is my belief that 13,860 is excessive given the current population density. I have witnessed an increase in traffic congestion around the Guildford area over the last 10 years to the point now where it is having a negative impact on quality of life.

Related to the above - the recent political changes will undoubtedly have an impact of net migration (immigration and emigration). This factor will need to be addressed by the Plan. Or at least confirmation of what % of the "estimated population" is attributed to migration from the EU. It may also be the case that we see a net emigration as EU migrants transfer to another Country still within the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16235  Respondent: 15636289 / Chris Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of what I see as a wholly inappropriate number of traveller sites. The region (especially the band running from NE Guildford through Normandy to Aldershot) already has the highest density of traveller sites I have seen in any other County. Why is this so, and why are more sites being considered when there are areas within Surrey with no traveller sites?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16236  Respondent: 15636289 / Chris Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Incursions into the Green Belt - I believe this is wholly inappropriate. The green belt is so designated to provide support for our Wildlife which is already under great threat from habitat destruction from over-development and to preserve an environment that is also conducive to maintaining an acceptable quality of life - access to sufficient open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16234  Respondent: 15636289 / Chris Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC states the population of Guildford is estimated to reach 162,188 by 2033. If the whole region is tarmacked and high rise flats built on every scrap of land this figure could easily rise to 500,000 or more. The more houses that are built, the more the population will increase. My question is, what is the accepted end point for development, and how is this reflected in the Plan? There has to be an end point where we say - enough. With the current infrastructure (unless additional roads are proposed to be built) what is this number? My concern is that Guildford will continue to sprawl and end up becoming a Borough of London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16237  Respondent: 15636289 / Chris Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The above outline some of my key objections to the Plan - I believe there are still many questions to be answered but possibly the greatest is "What do we want our environment to look like, and how do we want to interact with it?" I have seen Guildford deteriorate over the last 30 years through continued expansion from house building. This is a great shame.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3878  Respondent: 15636481 / Peta Lawrence  Agent:
<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
</tr>
</tbody>
</table>

There is a lack of precise detail for the proposed infrastructure. There is no timetable indicating its implementation, particularly in reference to the housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3876</th>
<th><strong>Respondent:</strong></th>
<th>15636481 / Peta Lawrence</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

There is a lack of published evidence for the proposed housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/3877</th>
<th><strong>Respondent:</strong></th>
<th>15636481 / Peta Lawrence</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Burpham has had excessive development over the last half century. Any development should be spread more evenly across the Guildford borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7248  Respondent: 15636481 / Peta Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Loss of green belt. The development at Gosden Hill farm will effectively join Burpham village with the nearby villages of Clandon and Send. There is no reason to ‘inset’ the proposed areas from the green belt apart from existing land ownership. Planning should not be seen to unfairly benefit private development companies to the detriment of existing communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16245  Respondent: 15636481 / Peta Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is little plan for genuine low cost affordable housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16246  Respondent: 15636481 / Peta Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The existing road network around Guildford is essentially at full capacity. Major road infrastructure initiatives, such as an A3 ‘by-pass’ tunnel, need to be assessed before housing sites can be defined.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16247</th>
<th>Respondent: 15636481 / Peta Lawrence</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

There is lack of detail for any initiatives which benefit the environment; which enforce the eco-systems and maintain bio-diversity. Indeed, there is a lack of assessment of existing bio-diversity; no assessments of current trends or of any planned enrichment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16248</th>
<th>Respondent: 15636481 / Peta Lawrence</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

There is little genuine regard for climate change, nor assessment of its impact on the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16244</th>
<th>Respondent: 15636481 / Peta Lawrence</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
There is a lack of assessment of existing ‘brownfield’ sites. Better use could be made of land for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1799  Respondent: 15636481 / Peta Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Draft Local Plan is an extensive document. It is difficult for ‘laymen’ to assess this within the time limits set by the council. More time for proper assessment is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3880  Respondent: 15636577 / Keith Mackman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inflated numbers of New Houses is totally unrealistic, even further now as a result of Brexit, and a new Govt, who no doubt will review the estimates advise a more realistic forecast of population future numbers and associated housing needs.

Green belt status should be maintained for the Horsleys.

The character of the Horsley villages, shops and housing, along with the associated area of countryside should be maintained, IN the Green Belt. This is fundamental.
The infrastructure is seriously compromised now, traffic including heavy vehicles, use totally inadequate country roads as a major means of cutting through, e.g., Clandon, West and East Horsley across to Leatherhead Bookham etc from the A3 / Dorking and return, etc these roads and other facilities, i.e. Drs, Rail Parking and Village amenities generally are now stretched well beyond their original design criteria.

These changes for the worst over the last 10 yrs is a result of increasing volumes of traffic etc using inadequate village roads, without very careful consideration of these aspects and the increasing expressed concerns of Residents and submissions of for example The Horsley Countryside Preservation Society.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/3884  **Respondent:** 15637377 / Cieran Leigh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please confirm receipt of this email and take regard of my submissions as follows:

- I object to removal of Send Village from the Green Belt
- I object to removal of Ripley and Send Marsh from the Green Belt
- I object to removal of Ripley from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/16255  **Respondent:** 15637377 / Cieran Leigh  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure in Send, Ripley and Send Marsh and Clandon is already overloaded and even now the smallest disruptions cause gridlock over much of our essentially rural roads network. Please also note that:

- I object to an expanded A3 interchange at Burnt Common,
- I object to housing and business development proposed for land described as Garlick’s Arch,
- I object to housing development at Clockburn Nursery,
- I object to housing development at Send Hill,
all of these sites being unsuitable and in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1802</th>
<th>Respondent:</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The previous draft local plan was withdrawn after generating widespread local opposition. Mole Valley MP Sir Paul Beresford observed:

“This catalogue of errors and omissions has led to a situation in which the Local Plan as presented has no detectable support from Guildford residents and has managed only to anger and worry so many of those who stand to lose the unique and valuable rural village lifestyle they currently enjoy in the Mole Valley Wards of Guildford Borough”.

Sir Paul’s commentary applies to the revised plan.

I object to this new or second Draft Local Plan (as Sir Paul anticipated it) because Guildford Borough Council still has not recognised local feeling and opinion in formulating it. I object to the failure to consult in any responsible way and to the approach taken for all of the reasons recited by Sir Paul which seem to have been ignored in compiling the new or second Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLP16/3887</th>
<th>Respondent:</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Page 965 of 2988
I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3886  Respondent: 15637633 / Scott Kent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7265  Respondent: 15637633 / Scott Kent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7264  Respondent: 15637633 / Scott Kent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

1. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

10. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7263  Respondent: 15637633 / Scott Kent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

6. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7262  Respondent: 15637633 / Scott Kent  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The proposal is not in keeping and sympathetic to the area as stated. The proposed is an over development squeezing far too many new small homes in a very limited space. 40 new homes would mean a prospected 80 number cars. Where would 80 cars park? This additional traffic would have a vast negative impact to the Send Hill road and again not be “sympathetic to the surrounding area”. This land is currently used by local residents for recreatonal walking and nature observing. Wood peckers, Owl’s Bats and badgers are all regularly seen here along with many other forms of wild life such as the protected May bug. The loss of their habitation could never be sympathetically catered for and would clearly be detrimental to their survival. The land is currently used as common land and should remain so as this is actually the only green open space for the local residents to use. The addition of two traveller’s pitches would [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] and again I do not see how anyone can argue that this is in keeping with the local area and its residents. Send villages road network and infrastructure is already at a capacity that exceeds that of the size of the village current road network as Send and its back road are used on mass as a trunk road through into Woking and beyond. We understand that that there are already plans to builder a number of homes at he bottom of Send Hill within the existing School grounds of St Bede’s. So the proposed is an over development of this immediate area.

I wish it to be noted that this is yet another attempt to over develop this area. Would you please advise when will the council stop threatening the residents of Send Hill?

I wish it to be noted that the Council has subjected this community to far too much repeated duress due to theses numerous and repeated threats / attempts to ruin the local area and its green belt country side. This has many detrimental impacts to those subjected to this process such as added stress, mental health certainly to the vulnerable and elderly. The council have a moral duty here to the residents of Send Hill of which it is clearly treating unfairly.

I am sure no one would object to sensible planning or development of which this is clearly not.

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Local Plan 2016, specifically with regard to the Horsleys development sites (A36, A37, A38 A39, A40 and A41) and Wisley Airfield developments.

I am writing to express my views regarding the Guildford Local Plan 2016 as outlined in the various presentations I have attended and the documentation I have read.

I acknowledge that the Borough Council is under pressure from central government when it comes to housing. Whilst many villagers would object outright to this plan, I understand the need for some development.

However, the plan that has been proposed is, far too much, not needed and not well supported with associated infrastructure. What is being proposed - nearly 500 homes and a 35% increase - changes the Horsleys from a village into a small town overnight, the scale of the proposed developments, and percentage increase in the housing stock, is utterly out of proportion with what is being proposed elsewhere in the Borough.

Firstly, I object to the erosion of the Greenbelt - these proposals do not meet the “exceptional circumstances” requirements, so why would we want to build on Greenbelt land? As you will be very aware the Conservative Party manifesto at the 2015 General Election committed a Conservative Government to “prioritise brownfield development” and to “ensure that local people have more control over planning and protect the Green Belt”. Now, just a year after this promise these proposals dishonour this commitment. Recent events should remind councillors of the strength of feeling that exists within the public and what happens when promises are broken. It should not be assumed that Conservative seats are guaranteed in this area.

Secondly, I specifically object to policies A36, A37, A38 A39, A40 and A41. If all of the proposed developments went ahead it would transform the Horsleys into a sizable town, something for which no case is made, the amount of new housing far exceeds local demand, and the density is excessive when compared with existing development. I am concerned that the Collective impact of these 6 sites on a small part of the borough has not been considered, surely given their proximity they should not be treated as isolated, separate sites. Horsley is already very busy; at rush hour you can easily be in severe traffic queues in a village; parking at a train station is very limited; and the infrastructure supporting the villages is already stretched. Policy A40 is especially unviable because of the high water table and poor drainage, leading to regular winter flooding.

The properties in this area have poor sight lines and the pavements are totally inadequate for school children, parents with prams and the elderly.

I also object to Policy A35 (WISLEY AIRFIELD). I don’t believe this should be in the plan for all the same reasons the Planning Committee rejected the ?identical recent proposal by Wisley Investment Properties. ?This is not a brownfield site as stated – only 15% of it. Anyone that has been on the A3/M25 Junction recently will know how impossible it is to join the motorway with existing traffic volumes, access is confined to inadequate narrow lanes and there is no existing public transport and no train stations in the locality. ?I also believe that over 2,000 houses will swamp and destroy the Ockham conservation area, with impact on listed buildings. ?The Water table and surface water flooding has not been considered either for the site itself or for downstream areas of the River Mole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7288  Respondent: 15639329 / Louise Herrington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, no assessment has been made of the collective impact on the area of the Wisley development and the 6 Horsley sites.

Please do not let the legacy of this council be one that destroys the greenbelt, impacting the next generations irrevocably and eroding thousands of years of history, character and place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3977  Respondent: 15639841 / May Craft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write as a resident of West Horsley in response to your draft Local Plan.

As an initial comment, I believe that you have wasted a great deal of public funds and energies of residents in this process. You could have considered matters better and allowed for a more focussed, constructive debate that the one you have precipitated. GBC has failed to act as a responsible steward by making unpalatable proposals which treat Green Belt classification with contempt.

My principal comment is to object to the proposal for villages being removed from the Green Belt. I do not believe that there is sufficient reason for this, although appreciate that this may not apply to all fields and circumstances where the provision of essential community infrastructure (such as schooling) is required.

I am livid about the contemptible manner in which GBC has conducted itself in relation to the local plan, wasting millions of pounds of money it is charged to steward. We moved into a village firmly set within the Green Belt, and paid a premium for that. We fully understood the constraints this places upon us and were willing to accept those constraints. Having paid for a Green Belt village to be home, it would be totally inappropriate an inequitable for GBC to take this away from people without compensation, which GBC could ill afford.

GBC needs to do things better, and in a more efficient manner. Importantly, GBC needs to demonstrate that it can act as a good steward of the borough in its current state before proposing increasing the size of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Improved safety for pedestrians and cyclists needed

Improved road safety to ameliorate the village environment for cyclists and pedestrians is vital. GBC should work with the highways authority and enforcement agencies to apply a zero tolerance attitude towards antisocial, dangerous and aggressive motorists. Safety for sustainable travel attracts insufficient attention in your Local Plan.

Generally, much more work needs to be done by GBC (in conjunction with Surrey County Council as the highways authority and the Parish Councils) to slow motor vehicles and to protect pedestrians and cyclists in East and West Horsley. The potential proposals in relation to East and West Horsley and Ockham give insufficient consideration to the infrastructure and the inability of the current road network to satisfactorily service the increased demand that would be placed upon it by potential development.

The roads in the villages are inappropriate for existing traffic using them and something must be done to ensure that they are no longer used as a cut through by commercial vehicles seeking to avoid the major trunk road network: this needs to be carefully considered as part of the local plan adoption process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to **OBJECT** to the terms of your currently proposed Local Plan. I am an eight year-old pupil at The Raleigh School. I have grown increasingly frustrated and disappointed by the irresponsible behaviour of adults. As a result, I have set up my own actin group with school friends, Future Thinkers. We are in the process of building a website intended to highlight the important issues where adults are behaving in an irresponsible manner towards the next generation and to also take action in the local community.

We have recently done a litter survey in one part of Kingston Meadow and found 105 items of rubbish strewn in the leisure area ad the woods in just 300 metres. This demonstrates that the Council has its priorities wrong at present--: you need to take action, in conjunction with the local police to both clean up and prosecute the criminals who leave litter before turning your mind to new development. You demonstrate your present irresponsibility as custodian of what you are currently responsible for: it is simply not feasible to give you responsibility to deliver further assets at this stage.

Loss of green belt land is irreversible and you must demonstrate exceptional circumstances on a case by case basis, not simply put out a case that development in other areas present practical difficulties: go and wrestle with those difficulties and deliver sustainable regeneration, rather than seek to build away the green lungs which are so vital for generations to come.

It is both unfair and irresponsible to seek the circumvent this central planning policy by simply re-zoning areas from green belt to outside of or inset into the green belt. Please think again.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/16487  **Respondent:** 15639841 / May Craft  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

---

**Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

---

**No exceptional circumstances which justify development of the Green Belt**

GBC has, to date, failed to make the case that exceptional circumstances exist to justify any attack on the sanctity of the boundary of the Green Belt as it currently stands. Indeed, GBC seems to be adopting a position which is contrary to central government policy.

Those who have made a conscious decision to live in a village within the metropolitan Green Belt appreciate the constraints (and responsibilities) that places on its residents.

About Guildford (winter 2013, GBC) stated the importance of maintaining a continued sense of community and to recognise the distinct character of each of the villages within the borough. The status of much of the borough as metropolitan Green Belt land is fundamental to this, protecting the area from the encroachment of London from the north east and from Guildford itself as well. Accordingly, the process for the development of the local plan must be delivered with the protection of community and the environment at the forefront. To date, there is insufficient evidence that this has been done and there is insufficient consideration of the legacy we would create for our children if GBC’s proposed wide-scale development assault on the Green Belt is allowed to proceed.

Accordingly, I strongly advocate for East and West Horsley (and the other villages within the borough) to remain within the Green Belt and should not be removed from it. However, if there is a powerful case for the re-zoning of a particular
field or fields for reasons which satisfy the high threshold set, that could be supported on a case-by-case basis. The provision of vital community infrastructure is a powerful example of where the sacrifice of a small piece of Green Belt land might become appropriate, provided that there is no other viable alternative.

**Loss of Green Belt Land is Irreversible**

As you have read in my earlier consultation response, to change the planning status of the Green Belt land around the metropolis and around Guildford would sent a clear (and negative) message that the rural nature of our precious and beautiful county is not something for which we are simply custodians and which therefore requires protection. A continued development linking London to Guildford along the axis of the A3 would be unacceptable and is contrary to the objective of Green Belt designation.

We are all stewards of our community for the generations to come. GBC and its residents are part of the same joint endeavour. Your Local Plan proposals seem to wish to polarise opinion and cause separation and division where consensus and common purpose is required.

The Green Belt land in the east of the borough protects our most precious natural asset, the North Downs and Surrey Hills, in their true, undeveloped, context. We should be justly proud of being the most wooded county in England (much of it ancient) and do everything to ensure that this precious heritage is passed down to future generations.

We have much to thank former generation for in the protection of our county's countryside in a manner which has delivered a vibrant local economy, whilst protecting our heritage. Today, it is the responsibility of the current councillors and officers of GBC and its residents to ensure that the work of past generations is not for naught and that the special characteristics of our borough are maintained.

If the Green Belt status of vast swathes of the borough were removed, there is a genuine risk that it is only the SSSI/AONB areas that would be appropriately and sufficiently protected from development for the benefit of biodiversity and for our children and successive generations. It should be remembered that that Green Belt status assists GBC in its stewardship of the borough so as to protect the precious nature of the area, whilst also permitting sustainable, proportionate and sympathetic development. Green Belt status clearly identifies areas which are “off limits” for most development.

Loss of undeveloped land within the current Green Belt is irreversible and it is our collective social responsibility to ensure that this does not happen.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Lack of proportionality in development in the area and lack of sustainability

GBC’s proposals for development in East Horsley and West Horsley are disproportionate to the area. Development should be focussed on Guildford Town Centre and increasing density in urban zones rather than increasing the size of sensitive villages which would:

• lead to a disproportionate impact in comparison with other parts of the borough better placed to deal with large population increases (in particular, Guildford Town Centre);
• cause irreversible harm to the Green Belt and the Surrey Hills AONB;
• place unmanageable pressure on local infrastructure (in particular, the local shops in East Horsley, Horsley Station, the Raleigh School, the Medical Centre and local roads); and
• not be sustainable.

Sustainability goes far beyond deploying low-carbon construction techniques.

Some limited development at Ockham Airfield might become appropriate if it met sustainability needs, focussed only on brownfield land and was accessible only from the A3, so as to not harm the villages. However, to deliver such a plan, it would be necessary to also address traffic congestion issues with Highways England on the A3 and the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1827</th>
<th>Respondent:</th>
<th>15639841 / May Craft</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Conclusion

Once development takes place on land, the change to the nature of an area is irreversible. Many appropriate non-Green Belt sites available within the borough which may be available for development and a number of these candidate sites are in public ownership: in order to comply with the NPPF and to ensure that GBC is able to optimise its cash position other candidate sites (particularly those within GBC or other public sector ownership) should be fully developed before any review of the Green Belt is undertaken.

GBC’s work to date seems to takes little account of the impact central planning decisions will take. For example, given GBC’s ambitions for economic development do not give consideration to both the ultimate decisions regarding new airport capacity locally, nor the desire of the majority of the population (as reflected in the 23 July vote) which is likely to place significant curbs on population growth of economically active people.

Furthermore, GBC now needs to re-work its statistics following the decision made by the rest of the country (not the GBC residents) to seek to leave the European Union. We must expect that out politicians are going to reduce population growth, with a resulting easing of the pressure for new housing supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3915</th>
<th>Respondent: 15639905 / Alison Azzopardi</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The evidence upon which all of these significant proposed developmental changes is based, seems to lack any correlation to the published housing requirements for the Borough. It seems to serve only as an attempt to alter the status of, and then usher in the destruction of, large areas of the green belt. I object to the proposals – as there are already identified brown field sites which would be ideal for development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3916</th>
<th>Respondent: 15639905 / Alison Azzopardi</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send Marsh/ Burnt Common</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I sincerely hope that all the views of residents in this wonderful part of the Borough are listened to and acted upon.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The area surrounding Burnt common, and Send should not be subject to such a range of disjointed development plans, they are in my opinion simply not workable in almost all instances.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7300</th>
<th>Respondent: 15639905 / Alison Azzopardi</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to any and all erosion of the green belt, there is precious little left in this area of the county. In setting local villages will destroy the area (Policy P2).

The area surrounding Burnt Common is now subject to a disproportionate level of suggested housing and development (Policy A43).

This was not included in the Regulation 18 Draft and therefore has not been consulted on previously, it seems a cynical method of circumventing the correct process. I object.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7302</th>
<th>Respondent: 15639905 / Alison Azzopardi</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The area surrounding Garlick’s Arch contains ancient woodland, protected by its position within the current green belt. Any relaxation of the planning rules to allow development in this area will open the door to further development. I object to this in the strongest terms.
- The proposed development of 400 homes directly on the large field adjacent to the A3 with an additional (and unnecessary 7000 sq m industrial area) will destroy a local business and the ‘Cobham Sporting Gun’ shooting club which has been in existence for the last 25 years. I feel extraordinarily aggrieved that a site, covered in woodland will be removed and sold for in excess of 20 times its current value (on the basis of grant planning approval for housing). I object to this strongly.
- Existing infrastructure, already under pressure will in no way benefit from increased residential accommodation in the area. There appears to be no provision for more schools or doctors surgeries to offset this increase in population. I object to this on the basis it is unsuitable in the extreme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7301</th>
<th>Respondent: 15639905 / Alison Azzopardi</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• The concept of a further suggestion of placing a 4 way interchange (Northbound and Southbound on slip) to the A3 will create absolute traffic chaos – ultimately creating a direct route, and thus increased traffic from Woking to the A3. I object to this unworkable and ill-conceived alteration to the road network infrastructure.

• During rush hour this route will take vehicles through mainly residential areas, and past the front of two nurseries, a medical centre and a first school. It will simply gridlock Send and Burncommon along the A247 main artery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3928  Respondent: 15640705 / M J Azzopardi  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The evidence upon which all of these significant proposed developmental changes is based, seems to lack any correlation to the published housing requirements for the Borough. It seems to serve only as an attempt to alter the status of, and then usher in the destruction of, large areas of the green belt. I object to the proposals – as there are already identified brown field sites which would be ideal for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7325  Respondent: 15640705 / M J Azzopardi  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The area surrounding Garlick’s Arch contains ancient woodland, protected by its position within the current green belt. Any relaxation of the planning rules to allow development in this area will open the door to further development. I object to this in the strongest terms.

- The proposed development of 400 homes directly on the large field adjacent to the A3 with an additional (and unnecessary 7000 sq m industrial area) will destroy a local business and the ‘Cobham Sporting Gun’ shooting club which has been in existence for the last 25 years. As a member of this club, I feel extraordinarily aggrieved that a site, covered in woodland will be removed and sold for in excess of 20 times its current value (on the basis of grant planning approval for housing). I object to this strongly.
• Existing infrastructure, already under pressure will in no way benefit from increased residential accommodation in the area. There appears to be no provision for more schools or doctors surgeries to offset this increase in population. I object to this on the basis it is unsuitable in the extreme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7324</th>
<th>Respondent: 15640705 / M J Azzopardi</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to any and all erosion of the green belt, there is precious little left in this area of the county. In setting local villages will destroy the area (Policy P2).
- The area surrounding Burntcommon is now subject to a disproportionate level of suggested housing and development (Policy yA43).
- This was not included in the Regulation 18 Draft and therefore has not been consulted on previously, it seems a cynical method of circumventing the correct process. I object.
- The concept of a further suggestion of placing a 4 way interchange (Northbound and Southbound on slip) to the A3 will create absolute traffic chaos – ultimately creating a direct route, and thus increased traffic from Woking to the A3. I object to this unworkable and ill-conceived alteration to the road network infrastructure.
- During rush hour this route will take vehicles through mainly residential areas, and past the front of two nurseries, a medical centre and a first school. It will simply gridlock Send and Burncommon along the A247 main artery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1813</th>
<th>Respondent: 15640705 / M J Azzopardi</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I sincerely hope that all the views of residents in this wonderful part of the Borough are listened to and acted upon.

The area surrounding Burnt common, and Send should not be subject to such a range of disjointed development plans, they are in my opinion simply not workable in almost all instances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3930  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Amount of new housing proposed far exceeds local need.

- Housing density excessive when compared with existing development.
- Would transform Ripley and Send into a sizable town, something for which no case is made.
- No local support.
- Collective impact of these 4 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
- Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on surrounding villages.
- Extension of settlement boundaries too permissive.
- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
- Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
- Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7330  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY A35 (WISLEY AIRFIELD): • Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. • Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application). • Unacceptable Conservative Party links between the developers and the Council. • No Green Belt “exceptional circumstances” presented. • Not a brownfield site as stated – only 15% of it. • Proposed SCC waste site ignored. • Loss of farming land. • Too near RHS Wisley and Thames Basin Heath SPA. • SANG would harm on SPA. • Will aggravate traffic jams at A3 roundabout and M25 Junction 10. • Unacceptable increase in air pollution. • No existing public transport and stations miles away. • No proper traffic data. • Housing density far too great. • Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings. • Access confined to inadequate narrow lanes. • Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole. • Major impact on neighbouring villages, especially Ripley, Send and the Horsleys. • No assessment has been made of the collective impact on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16343  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D1 (BETTER PLACES): • Poor monitoring. • No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16344  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC): • Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16345  Respondent: 15640897 / Jackie van Heesewijk  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT): • Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets. • Doesn’t ban development near historic assets. • Ignores NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16346  Respondent: 15640897 / Jackie van Heesewijk  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES) • No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes. • Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt. • Objectives for inset villages cancelled out by plans for excessive housing growth there. • Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16335  Respondent: 15640897 / Jackie van Heesewijk  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E1 (EMPLOYMENT): • Poor evidence base. • Too much encouragement to low added-value employment that’s needed elsewhere in the country. • Fails to concentrate general business activity in urban areas or business parks that have the infrastructure. • Fails to differentiate this from appropriate rural business. • Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16336  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE): • Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16337  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK): • Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose). • No cost/benefit analysis of harm to Green Belt involved in extending research park. • Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16338</th>
<th>Respondent: 15640897 / Jackie van Heesewijk</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I OBJECT TO POLICY E5 (RURAL ECONOMY):</strong></td>
<td>Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.</td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16339</th>
<th>Respondent: 15640897 / Jackie van Heesewijk</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):</strong></td>
<td>Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No policy of opposing reduction in rural hotel capacity.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No definition of what added value interventions by Council can make to normal visitor market mechanisms.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.</td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16340</th>
<th>Respondent: 15640897 / Jackie van Heesewijk</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT TO POLICY E7 (TOWN CENTRE): • No statement in policy wording of value of Guildford’s rural setting and views. • No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans. • Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration. 4 • No brownfield register. • Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston. • No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16341</th>
<th>Respondent:</th>
<th>15640897 / Jackie van Heesewijk</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO POLICY E8 (DISTRICT CENTRES): • Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub. • No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16342</th>
<th>Respondent:</th>
<th>15640897 / Jackie van Heesewijk</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E9</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO POLICY E9 (LOCAL CENTRES): • No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16330</th>
<th>Respondent:</th>
<th>15640897 / Jackie van Heesewijk</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 (HOMES FOR ALL): • Policy doesn’t set any constraints on building. • Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors. • Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation. • Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16331  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES): • It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16347  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY) • Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan. • Excessive housebuilding in countryside not supported by any funding or provision for infrastructure. • Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure. • Draft CIL scale discourages use of brownfield land first. • No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16348 Respondent: 15640897 / Jackie van Heesewijk Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP'S ROAD STRATEGY): • Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough. • Out of sync with DTP’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented. • Road plans too optimistic anyway, especially post-Brexit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16349 Respondent: 15640897 / Jackie van Heesewijk Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT): • Just a list of generic measures, not related to real life or the particularities of Guildford. • Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development. • Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. i.e. most residents! • Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE): • Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT: • No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

I OBJECT TO POLICY P2 (GREEN BELT): • No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements. • No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions. • Impact of Green Belt development on local agriculture ignored. • Impact on rural leisure and tourism ignored. • Impact on flood control ignored. • Impact on carbon sink and knock-on effects for air pollution and climate change ignored. • Impact on biodiversity ignored. • Impact on natural heritage ignored. • Impact on water catchment ignored. • Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored. • Impact on rural business (e.g. mineral mining, film making) ignored. • Impact on natural landmarks and views ignored. • Harm to public health and wellbeing (physical, psychological) ignored. • Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections. • Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF. • Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size. • Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much
needed urban regeneration. • “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective. • Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields. • Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit. • Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16332  Respondent: 15640897 / Jackie van Heesewijk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT): • Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl. • Special treatment of ward represented by current Council Leader and his predecessor. Politically biased. • A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16333  Respondent: 15640897 / Jackie van Heesewijk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION): • Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16334  Respondent: 15640897 / Jackie van Heesewijk  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.): • Compensation mechanism too feeble to provide protection. • Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16328  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT): • No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning. • No statement of how economic, social and environmental impacts should be balanced. • No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it. • No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16329  Respondent: 15640897 / Jackie van Heesewijk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY): • Numbers based on growth and demographic data now invalidated by Brexit. • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure. • 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account. • Figures based on a Housing Market Area that ignores 2 neighbouring districts
(Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units. High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3933  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/3934  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report which concludes that 693 homes a year are required by the borough, it is more than double the previous figure of 322 used in previous plans. I believe the SHMA report methodology to be inaccurate; it inflates the needs of the borough by distorted student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.
The National Planning Policy Framework allows the overall housing target to be reduced to take into account protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to the Guildford area. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7337</th>
<th>Respondent: 15641281 / Paula Redmond</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan.

The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7335</th>
<th>Respondent: 15641281 / Paula Redmond</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-----------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which permit the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the last minute a more appropriate and equivalent brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11 May 2016.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. A Habitats Assessment has been carried out but there is absolutely no mention of wildlife species affected in the report. No wildlife report has been conducted on the site. (Policy I4). Bats are specially protected and no specific assessment has been carried out in accordance with the Wildlife and Countryside Act 1981.

It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPS16/7336 | Respondent: 15641281 / Paula Redmond | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford and the A25 would have to go through Clandon and Burnt Common. This has the potential to cause damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16359  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanently damaging impact on the character and wildlife of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

References used by the Plan for the assessment of wildlife and habitats assessment is out of date – further species have been added to the BoCC 4 Amber list and Red list. Endangered species likely to be affected by the plans are:

Cuckoos
Turtle Doves
Lesser Spotted Woodpecker
Mistle Thrush
Grey Wagtail
Yellow Wagtail

Redwing (winter migrant)

Nightjar

No mention is given in the Plan or the Sustainability of specific rare and protected species resident or migrating through the area. There needs to be a full assessment of all those protected species that are likely to be in affected woodland, trees, hedgerows and heaths and those specifically found in the Thames Basin Heaths that could be dependent on these areas and their populations as wildlife corridors/stop overs/sources of food/breeding areas. Any assessment must include those species who might be difficult to see in normal circumstances – nocturnal species (bats, owls, badgers, foxes, nightjars), ground nesting animals, insects, invertebrates and birds (such as short eared owl – essentially invisible apart from when hunting), seasonal visitors, breeders and migrants, those with long gestations and short life spans, such as stag beetles, whose larvae remains under rotting trees and soil for up to 6 years before emerging as adults for a short period to mate and breed again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16368  Respondent: 15641281 / Paula Redmond  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16356  Respondent: 15641281 / Paula Redmond  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could instead accommodate a development of 7,000 sq m. The Garlick’s Arch site is in the Green Belt and should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable (as stated in X provisions…).

Add about woodland and wildlife here if relevant

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16357</th>
<th>Respondent: 15641281 / Paula Redmond</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

Garlick’s Arch is Green Belt land and should not be developed or built on or otherwise when there is a nearby and more suitable brownfield site available.

Add about woodland and wildlife here if relevant

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16358</th>
<th>Respondent: 15641281 / Paula Redmond</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses and the loss of jobs of existing local employees. Currently employed local residents may therefore have to look outside of the area for employment and therefore increase travel that is currently unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16360  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
I object to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site. Any plans to improve these facilities must be sustainable.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Funding for Police services is being. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16361  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

No consideration has been given to the increase in traffic, congestion, disruption and emissions when combined with Surrey County Council’s plan to start gas extraction and production works nearby at Albury Heath (AONB), which will mean drilling 24/7 for 15 years.

It is understood that the remit of Local Councils does not include consideration of plans outside of it’s area of responsibility, or the cumulative effects, however, it must be for Central Government to oversee all development projects closely enough to establish when there are conflicts of interest. It is irresponsible not to consider the cumulative damaging
effects to the locality, the community and the environment as a whole. It is irresponsible to ‘pass the buck’ to other
Councils and Government and leave local residents and communities to suffer the consequences of this siloed approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16362  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental
impacts and impacts on amenity and health.”

The significant level of development being proposed, particularly in the north east of the borough will lead to considerable
 increases in congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up
 residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents
 and their health.

The Plan does not consider the cumulative effects in conjunction with Albury Heath AONB Compressed Natural Gas
 extraction plans which have just been approved by Surrey County Council and falls within Guildford Borough Council

The Plan does not consider the wider environmental effects in conjunction with the 200 other Green Belt site being
developed by local councils around London Area or its effect on all residents in and around the M25 area.

The Plan does not consider the cumulative impacts on TBH and London and South East nature reserves and wildlife
habitats.

The Plan does not consider the cumulative impacts of the Plan in conjunction with the possible development of 3rd runway
at Heathrow and associated damage to air quality.

The Plan does not mention or show calculations of the considerable damage to air quality during demolition and
construction phases as well as completion.

The Plan does not quantify or assess the extreme disturbance to local residents and wildlife during the construction phases
which will be continuous over many years – this is unacceptable and unsustainable, especially when combined with Surrey
County Council’s Compressed Natural Gas Extraction site at Albury Heath AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16369  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
I object to the detrimental impact on transport, local roads and road safety

I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated and, even within the development itself, too spread out to anticipate a reduced reliance on private cars.

1. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

1. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

1. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

1. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

1. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

I object to the fact that air quality concerns have not been taken seriously

Air pollution in many parts of the borough, particularly at the M25/A3 junction, is already in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Traffic and Transportation

The increase in vehicle movements is very concerning, given the nature of their load. In effect there will be a couple of tonnes of compressed gas being moved on a daily basis. These vehicles are a serious danger to not only the local population around the site but to those on the route to the ultimate destination. A recent US study, by the National Institute for Occupational Safety and Health, showed that vehicle crashes are the single biggest cause of fatalities to oil and gas workers while the increase in onshore gas production has resulted in a 350% increase in traffic fatalities in regions where gas production is occurring.

The increase in traffic will also increase local pollution levels, vehicles transporting plant, equipment, workers and compressed gas are mostly heavy diesel engined vehicles - the most polluting to the environment. A recent NHS study showed that 40,000 deaths in the UK each year are directly caused by pollution.

Evidence was found to suggest that long-term exposure to air pollution is linked to:

- decline in lung function in adults – which can be a risk factor for chronic obstructive pulmonary disease
- asthma
- type 2 diabetes
- problems with brain development and cognition (thinking ability)
- cardiovascular diseases – conditions that can affect the heart and blood vessels, such as coronary heart disease
- cancer

15 years of 24/7 gas production activity will create unacceptable increases in local pollution levels, affecting the public, local residents, wildlife and ecosystem. The Green Belt is designed not only to provide ‘openness’ and prevent ‘urban sprawl’ but also to provide compensation for human polluting activities and to maintain biodiversity supporting our ecosystem, absorbing carbon and other pollutants from the environment and helping to clean our air, which is already failing to meet levels for good health. Damaging the Green Belt and cutting ancient woodland has a devastating effect on human health and local wildlife.

Albury civil parish spans the small village and three hamlets, which are Farley Green, Little London and adjacent Brook – spaced out by Albury Heath, Foxholes Wood, small fields and Albury Park. About a third of Blackheath Common on the Greensand Ridge is in the parish, which centrally nestles in the 'Vale of Holmesdale'. Albury new village is at the point where the Sherborne flowing from near Newlands Corner via the Silent Pool joins the Tillingbourne that runs through the centre of the village and until the 20th century fed the flour mill at the Chilworth edge of the village. The old village lies within Albury Park. There is another brook leading into Chilworth called Law Brook which Brook is centred on. The potential for polluting these local water courses which support a range of wildlife, is unacceptable. The area contains and is adjacent to nature reserves, National Trust sites and SSSIs which provide habitats to a number of rare and endangered species.

The roads around an AONB are totally inappropriate for these sorts of vehicle movements, and the villages the HGVs will pass through are densely populated and the roads very narrow in places, frequently used by walkers, cyclists, and passing birds and wildlife (particularly during migrations and breeding seasons when wildlife populations can increase greatly and are more vulnerable with young), the risk of accident, injury and death is unacceptable. There are regular small cycling groups as well as large organised events using the roads in Albury and nearby, the The Surrey Hills Cyclone Sportive passes through Albury, The Dirty Weekend series and many others. This will create unacceptable road and health hazards for the cyclists and increased congestion for everyone during these times.

If the proposals by Guildford Borough Council for development of 20,000 new dwellings in the Guildford area go ahead, including several thousand properties and associated urban development around the nearby villages of East/West Clandon, East/West Horsley, Wisley, Ripley, Send Marsh, Pyford, Ockham, etc. the cumulative effect of increased vehicle numbers during construction and thence from new residents (20,000 new properties will likely swell local populations by around 45,000 and their vehicles) will cause utter carnage. Recent heavy rainfall caused flooding at the A3 underpass at Kingston causing a 3hr traffic jam back as far as Ripley and surrounding villages (I had the pleasure of being caught up in it personally), which shows that these roads cannot cope with the volume of traffic as it is, particularly during poor weather or if there is an incident or accident blocking the roads. The added pressure on the A3, A25, A246 and knock-on effect on the M25 will be intolerable even in the best of conditions. The cumulative effect on local pollution, congestion, competition
for space, resources and amenities, and detrimental effect on health of local communities and wider populations will be very significant. It’s like watching a perfect storm forming with Guildford at the centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/17460  **Respondent:** 15641281 / Paula Redmond  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I am a landscape and wildlife photographer and frequent visitor to Albury Heath, Blackheath and surrounding countryside and villages. Surrey has some of the most beautiful and rare countryside and species of flora and fauna in the UK, some of it’s habitats are unique and are of national and worldwide conservation importance.

I wish to object in the strongest terms possible to the application by IGas for production at the above site. As you know, planning applications have to be decided against national and local planning policy. The IGas proposals conflict with policies in the:

- National Planning Policy Framework (NPPF)
- Surrey Minerals Plan
- Guildford Local Plan
- Metropolitan Green Belt

The recent planning officers report defined the proposal as a “major development”. Under the NPPF paragraph 116, planning permission should be refused for major developments in AONBs except in exceptional circumstances and where it can be demonstrated they are in the public interest.

The planning officers accepted the development would have:

- some detrimental effect on the landscape and would not enhance the natural beauty of the AONB during either the construction or operational period.” That the proposal amounted to “significant harm” to the Green Belt by encroaching on openness.

The proposal also breached policies designed to protect the AONB in the Surrey Minerals Plan and Guildford Local Plan.

The Surrey Minerals Plan policies MC2 and MC14 state that minerals developments in the AONB can be approved only if they have been demonstrated to be in the public interest, there is a need for them and there will be no significant adverse impacts on the appearance, quality and character of the landscape.

Policies RE5 and RE6 in the Guildford Local Plan seek to conserve the visual quality or distinctive character of the AONB. Policy RE2 states that new building would be inappropriate unless it prevents sprawl, reserves character or assists urban regeneration.

The planning officers’ report also says that the proposal would harm ancient woodland by creating car parking on the access track. The NPPF says loss or deterioration of irreplaceable habitats, such as ancient woodland has to be outweighed by benefits.
Ancient woodland, however, is exactly that ‘irreplaceable’. Even if ‘translocated’ or ‘compensated’ in some way (as is required by the LPPF), you cannot replace the wildlife habitats provided by ancient and veteran trees like for like, you cannot explain to the birds, mammals and insects who live, eat and breed there that they have to move, or those species that may use it as a stopover on migration, a wildlife corridor between the other important sites in the area, such as the SSSI site at Colyers Hanger and Blackheath. Surrey has 62 SSSIs, 54 of which are listed for their biological interest (https://en.wikipedia.org/wiki/List_of_Sites_of_Special_Scientific_Interest_in_Surrey). We do not know what impact further development and disruption within these areas may have on the delicate balance of nature within them. Nature is not contained - it moves, flies, burrows, swims, migrates through and between such sites, woodlands which are of national importance and rarity.

You cannot artificially replicate the balance of biodiversity that nature has created over decades if not hundreds of years (despite what the LPPF suggests). Removal of ancient trees and woodland and disturbance of soil beneath them releases carbon dioxide that is locked inside. Further, veteran trees have been shown to be up to 10 times more effective at absorbing carbon than new plantations. It takes further decades if not centuries for new plantations to develop the rich habitat potential of old woods, some delicately balanced, rare and endangered species never recover or take many years to recover or reestablish colonies. Stag beetles, for example, are a protected species that spend around 6 years of their lives unseen, underground in larvae form, in the soil under rotting wood commonly found in woodland. Nightingales return to the exact same tree each year to sing to attract a mate. Owls, bats and other creatures use holes in old trees to nest in. Conservationists and scientists are still researching the rapid declines in our native species and the impact that further declines may have on our ecosystem. The UK has lost 60% of all species in recent years. Most explanations given are urban development, loss of habitat, pollution and other human interventions. Trees, plants and many wildlife species are suffering diseases and attacks that they were not normally susceptible to. If 40,000 humans die from pollution related respiratory and cardio vascular diseases each year, you can imagine the effect on smaller organisms health and immune systems must be devastating.

I reject, in the strongest terms, the conclusion of the planning officer that all of the above negative impacts can simply be outweighed by a national ‘need’ for ‘indigenous’ gas supply.

The recently released DECC Committee on Climate Change report stipulates that UK onshore gas production should only be permitted if three vital conditions are in place (extract - link to full document is provided below):

Test 1: Well development, production and decommissioning emissions must be strictly limited. Emissions must be tightly regulated and closely monitored in order to ensure rapid action to address leaks.
- A range of technologies and techniques to limit methane emissions should be required, including ‘reduced emissions completions’ (also known as ‘green completions’) and liquid unloading mitigation technologies (e.g. plunger lift systems) should these be needed;
- A monitoring regime that catches potentially significant methane leaks early is essential in order to limit the impact of ‘super-emitters’;
- Production should not be allowed in areas where it would entail significant CO2 emissions resulting from the change in land use (e.g. areas with deep peat soils);
- The regulatory regime must require proper decommissioning of wells at the end of their lives. It must also ensure that the liability for emissions at this stage rests with the producer.

Test 2: Consumption – gas consumption must remain in line with carbon budgets requirements. UK unabated fossil energy consumption must be reduced over time within levels we have previously advised to be consistent with the carbon budgets. This means that UK shale gas production must displace imported gas rather than increasing domestic consumption.

Test 3: Accommodating shale gas production emissions within carbon budgets. Additional production emissions from shale gas wells will need to be offset through reductions elsewhere in the UK economy, such that overall effort to reduce emissions is sufficient to meet carbon budgets.

of these conditions, especially Carbon Capture and Storage technologies, are remotely certain to be met.

I implore you to reject this proposal in an AONB as there are no reasonable ‘exceptional circumstances’ and it is clearly not in the national public interest, given our legally binding climate change mitigation commitments, and it is certainly not in the local public interest.

**Air pollution and emissions**

The period of gas flaring is very concerning for a number of reasons.

The Research Journal of Environmental and Earth Sciences 4(5): 525-528, 2012 states:

‘Gas flares have harmful effects on the health and livelihood of the communities in their vicinity, as they release a variety of poisonous chemicals. Some of the combustion by-products include nitrogen dioxides, sulphur dioxide, volatile organic compounds like benzene, toluene, xylene and hydrogen sulfide, as well as carcinogens like benzo(a)pyrene and dioxins. Humans exposed to such substances can suffer from variety of serious ill-health effects.’

No detailed analysis has been produced of the gas to be flared. This is a serious omission from the application.

Evidence of gas flaring from the USA and Australia suggests that the total harm caused by flaring pollutants is more than the sum of the individual components.

Natural gas processing is a significant source of fugitive emissions of both methane and volatile organic hydrocarbons (VOCs). The World Bank estimates that every year, some 360 million tonnes of CO2 is released to the atmosphere through flaring and venting. This has a detrimental effect on the environment, contributing significantly to global warming and acidification of both land and sea. A considerable proportion of this CO2 comes from the production of Oil and Gas. At a crucial point in human history, if we are to avoid runaway climate change ‘keeping it in the ground’ needs to be the concern of every public authority, and indeed the UK’s Climate Change Act 2008 places legal obligations on public bodies to comply with emission reductions targets relating to climate change. These duties require that a public body must, in exercising its functions, act in the way best calculated to contribute to the delivery of emissions reduction targets. Flaring is incompatible with this objective, which is why there are international calls for ‘green completions’, involving the capturing of the gas – this is not proposed at this site.

**Gas compressor emissions**

Very concerning for the local population is the proposed notion of powering the gas compressor by burning some of the gas from the well 24/7 for 15 years. There needs to be a detailed analysis of the effects of the exhaust emissions of this from a variety of aspects: human health, ecology, local amenity impacts e.g. from those using the nearby playing fields. Moreover, the effect on vegetation and local wildlife species at a time when many native and migratory species and their habitats are in drastic decline is likely to be very significant and totally unacceptable from a conservation point of view.

The environmental heating effect of methane is significantly higher than CO2. It is still a fossil fuel and at a time when we should be reducing UK and World dependence on fossil fuels we do not give a good impression to our European neighbours or the rest of the world by promoting this type of fuel production and adding to our own domestic fossil fuel output and pollutant totals. Given the extreme threats to the earth from climate change (the rebranded friendly term for global warming), rapid melting of the polar regions, more extreme weather - drought (it is estimated that 50 million people will be displaced due to desertification within 10 years), storms and floods (the UK has had some of the worst flooding and storms in history in recent years), earthquakes and forest fires (there have been record temperatures, dry periods/drought conditions in the US, Canada, Amazonia Rainforest and Russia in the last 12 months), etc, our relentless exploitation of our environment and ecosystems has the potential to snowball us into global disaster at a far greater rate than we or scientists first thought. Key ‘canary in the mine’ species are in grave danger of extinction, everyday species such as pollinators, bees, butterflies, many species of birds, are in desperate decline. Our whole ecosystem’s reproduction depends on these species. We must set an example to the rest of the world and make a commitment to ‘green’ energy, not just to less or differently polluting fuels. We cannot continue to ignore the global environmental implications of pollution as well as the local impacts. We cannot continue to ignore the place our plant and wildlife has in our ecosystems, our entire existence depends upon on it.
"Methane is a more potent greenhouse gas than carbon dioxide (CO2), trapping more heat in the atmosphere molecule-for-molecule. But it is much shorter-lived: it decays on a timescale of around 12 years, whereas around a fifth of the effect from CO2 remains even after 1,000 years. This means a unit emission of CO2 today will affect the climate in 2100 and beyond. In contrast, the same unit emission of methane will have little effect on climate in 2100, but a stronger effect on the climate of the next few decades" - This means that as well as our current CO2 emissions having a runaway train of environmental effects lasting hundreds of years, gas production will increase the ‘greenhouse gas’ heating effect in the shorter term, which is potentially far more damaging as weather systems, the oceans, wildlife and plant species struggle to adapt to the unnatural rate of change of temperature and seasonal variations and confusion. This also means that the local communities will have to suffer the effects of methane and other greenhouse gas emissions for many years a

The UK is also inexperienced in this field of gas production "the UK has no exploration flow data, let alone production data, it is too early to speculate on the likely productivity of UK wells"

This report shows that there are no certainties, about it’s potential yield and value to market, about safety, about the stability of our soil and infrastructure, about the expertise and experience of the employees, about the controls and monitoring that will protect the public and what contingencies would be in place should there be a major accident or leak or explosion at the site or during transportation. The safety and health of the public should be an absolute priority, even if this site did not involve destruction of woodland and damage to an AONB. The fact that it is an AONB means that testing out a fledgling gas extraction process, without knowing the consequences, is a recipe for disaster.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17462  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The 24/7 nature of operations means that noise and light pollution, as well as air pollution, will be a constant disturbance to local village residents and to wildlife for a 15 year period, damaging health, wellbeing, property values, access to local amenities, access for emergency vehicles and no let up in emissions so air quality has no chance to recover by even a small amount overnight. This will also affect the nocturnal species in the area, bats, owls, badgers, foxes, nightjars, hedgehogs to name just a few.

The potential long term and constant disturbance and damage caused to local populations and wildlife is entirely unacceptable.

Given the uncertainty of the future of UK regulation with our impending exit from the EU and the widespread environmental protection, of public health regulations, water purity directives, health and safety regulations, wildlife protection regulations, bird protection directives, etc. and the change of Prime Minister (it was David Cameron’s personal ambition to fast track licences for domestic gas production and fracking despite EU opposition and public opinion and protest against it, with complete disregard for all the protective laws in place to preserve AONBs, SSSIs, National Nature Reserves and SAPs and with overwhelming scientific and practical evidence of the hazards it can and has presented both in the US and during testing in the UK, where air and water have been polluted and localised earthquakes have been a result) and Cabinet, possibly even a General Election in the near future it could be potentially dangerous and unlawful to proceed with these plans.
I urge you most strongly and without hesitation to reject this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16354 | Respondent: 15641281 / Paula Redmond | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to not protecting the Green Belt (Policy P2)

I object to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16366 | Respondent: 15641281 / Paula Redmond | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to development in areas which are at risk of flooding and may increase likelihood or worse effects of flooding in the locality (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to not protecting the wildlife within the range of the Local Plan and the cumulative impacts on wildlife populations in the Thames Basin Heaths and the UK as a whole P5

“The [Wisley] PMDA is located within a Site of Nature Conservation Importance (SNCI) as stated above. A designated Special Protection Area (SPA), Important Bird Area, Local Nature Reserve and Registered Common Land is also located to the north of the disused airfield within Ockham Common. The 400 metre buffer of the SPA includes land to the north of the PMDA generally to the north of the disused runway. Residential development would not be appropriate within the 400 metre SPA buffer, however, it may be suitable for other uses.”

“A designated Conservation Area is located at Ockham village to the south of the PMDA.”

It should not be forgotten that Green Belt and “buffers” are also wildlife corridors – birds and wildlife on Ockham Common - and throughout nature reserves and other important bird and wildlife sites across the country and Europe and worldwide – they move! Some species are resident but move between various locations, others are migratory species who need to link up breeding and feeding sites using wildlife corridors and stop over sites. If these areas are destroyed then the ability for our native and migratory species will be irreparably damaged and the species will die out. Development close to such internationally important wildlife and nature sites such as those found locally in Surrey and the North Downs can have a devastating and widespread effect way outside of the direct construction zone and developed site.

A Special Protection Area (or SPA) is a site designated under the Birds Directive. These sites, together with Special Areas of Conservation (or SACs), are called Natura sites and they are internationally important for threatened habitats and species. SPAs are areas of the most important habitat for rare (listed on Annex I to the Directive) and migratory birds within the European Union.

Wisley Airfield is located within a local plan Site of Nature Conservation Importance (SNCI). The Guildford Borough Sites of Nature Conservation Importance Surveys (2004 –2007) describes this SNCI as a “disused airfield with derelict tarmac runway, arable fields, semi-improved grassland and hedgerows. This site is selected for its importance for reptiles, plants and birds.

9 notable Surrey plant species have been recorded on the site.

In addition 3 RSPB red list bird species and 7 RSPB amber list bird species have been recorded on the site.

The site has an exceptional or good population of a number of reptiles and amphibians.”

*IUCN Red List has just been updated for 2016 – there are now more species to be considered that were noted above.

What measures will the Council going to take, should development of Green Belt go ahead, to translocate/compensate for the loss to humans and wildlife? Are they going to give financial compensation to village residents and businesses for loss of value to their homes due to insetting and loss of revenue during the disruption of the building phases. Will they compensated for the increase in respiratory, cardiovascular and other pollution related diseases that they and their children and pets will suffer?

Is there a more up to date wildlife survey by the Council? – latest report by Surrey Wildlife seems to be 2004-2007

About 80 percent of butterfly species are confined to narrow home ranges that can be as little as an acre, and they’re unlikely to migrate across even a half-mile of inhospitable ground to find another suitable habitat. So a neighbourhood of meticulously maintained lawns, or a single highway, can be fatal for a species. Some butterfly species also have complex relationships with local ant species. These kind of complicated relationships are easily jeopardized by change. Pollution, drainage schemes, and climate change are among the other landscape-scale factors threatening butterflies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35) and Garlick’s Arch (A43) are in unsustainable locations. They do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided and additional railway stations are planned.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16353  Respondent: 15641281 / Paula Redmond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being...
located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16364  Respondent: 15641281 / Paula Redmond  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan not anticipating or considering the wider implications and cumulative impacts of developments

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16365  Respondent: 15641281 / Paula Redmond  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan not considering the full impact on air and water quality and environmental pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

As new resident with a 19 month year I child I write with great concern regarding the site proposals within the West and East Horsley green belt.

The Waterloo Farm site would back straight on to our family home and the density of new houses would quite literally damage the quality of living we have worked so hard to create.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As new resident with a 19 month year I child I write with great concern regarding the site proposals within the West and East Horsley green belt.

The Waterloo Farm site would back straight on to our family home and the density of new houses would quite literally damage the quality of living we have worked so hard to create.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16377  Respondent: 15641441 / Orna Talbot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a duty of care to existing residents what are you doing to support our quality of living? Is the borough strategy to compromise everything to 'below average'? The unbalanced nature of the plans can surely only have a negative result for a village of great character - on your watch will another location of great character turn into generic concrete sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16419  Respondent: 15641441 / Orna Talbot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a duty of care to existing residents what are you doing to support our quality of living? Is the borough strategy to compromise everything to 'below average'? The unbalanced nature of the plans can surely only have a negative result for a village of great character - on your watch will another location of great character turn into generic concrete sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16376  Respondent: 15641441 / Orna Talbot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thus far we see a perverse number of new homes in the plan and no strategy to protect the quality of living for those who already reside here? What is the strategy to protect the quality of schooling for my child, to keep roads safe, medical services, public transport, parking? In short what is the infrastructure strategy so support these new planning proposals?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16418</th>
<th>Respondent:</th>
<th>15641441 / Orna Talbot</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thus far we see a perverse number of new homes in the plan and no strategy to protect the quality of living for those who already reside here? What is the strategy to protect the quality of schooling for my child, to keep roads safe, medical services, public transport, parking? In short what is the infrastructure strategy so support these new planning proposals?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16378</th>
<th>Respondent:</th>
<th>15641441 / Orna Talbot</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What are the exceptional circumstances that allow you to take away our green belt, our quality of living and compromise the access to services our son will have growing up?

I urge you to not race to the bottom and urge you to preserve what is good.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What are the exceptional circumstances that allow you to take away our green belt, our quality of living and compromise the access to services our son will have growing up?

I urge you to not race to the bottom and urge you to preserve what is good.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I have yet to see any evidence of the need for the proposed number of houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I chose to move to Ripley when I was 74 because it is a peaceful and very pretty village that I have known and loved since I was a child. The people of Ripley work tirelessly and have done over the years, to conserve the delightful individuality and personality of this village and its shops, businesses, pubs and residents have also respected and supported this ethic.

I am absolutely horrified to see how the proposed plans ride roughshod over the very essence of this and the other villages concerned who are at present protected by The Green Belt who like Ripley are small and very valuable to all who visit, work or live in them. What could possibly justify destroying a pretty village in order to create a suburb? Why not create an independent new town for the new housing surrounded by Green Belt instead of destroying a community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3938  Respondent: 15641505 / Annabella Goldsmith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of Garlicks Arch, the four traveller pitches at The Paddocks and the overdevelopment at the Talbot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7348  Respondent: 15641505 / Annabella Goldsmith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The ramp at Burnt Common/Clandon will only increase the traffic problems in Ripley Village and the whole area. Just imagine how it would be given that Ripley Village is one street, and the traffic already traverses the Village mostly at speeds in excess of 40 mph.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16380  Respondent: 15641505 / Annabella Goldsmith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The massive overdevelopment of 2000 homes at Gosden Hill Farm which is presently Green Belt and the 2000 proposed homes at Wisley Airfield which is also Green Belt land. Inappropriate and totally unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16379  Respondent: 15641505 / Annabella Goldsmith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

That the proposed development is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16381  Respondent: 15641505 / Annabella Goldsmith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is certainly far too much development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3941</th>
<th>Respondent: 15641569 / Trevalyn Gregory</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3940</th>
<th>Respondent: 15641569 / Trevalyn Gregory</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In regards to the planning consultation for the area of Send and in particular the Send Hill proposal I wish to strongly object on the following grounds.

The proposal is not in keeping and sympathetic to the area as stated. The proposed is an over development squeezing far too many new small homes in a very limited space. 40 new homes would mean a prospect 80 number cars. Where would 80 cars park? This additional traffic would have a vast negative impact to the Send Hill road and again not be “sympathetic to the surrounding area”. This land is currently used by local residents for recreational walking and nature observing. Woodpeckers, Owl’s Bats and badgers are all regularly seen here along with many other forms of wild life such as the protected May bug. The loss of their habitation could never be sympathetically.
catered for and would clearly be detrimental to their survival. The land is currently used as common land and should remain so as this is actually the only green open space for the local residents to use. The addition of two traveller’s pitches would unfortunately immediately degrade the neighbourhood and again I do not see how anyone can argue that this is in keeping with the local area and its residents. Send villages road network and infrastructure is already at a capacity that exceeds that of the size of the village current road network as Send and its back road are used on mass as a trunk road through into Woking and beyond. We understand that that there are already plans to builder a number of homes at he bottom of Send Hill within the existing School grounds of St Bede’s. So the proposed is an over development of this immediate area.

I wish it to be noted that this is yet another attempt to over develop this area. Would you please advise when will the council stop threatening the residents of Send Hill?

I wish it to be noted that the Council has subjected this community to far too much repeated duress due to these numerous and repeated threats / attempts to ruin the local area and its green belt country side. This has many detrimental impacts to those subjected to this process such as added stress, mental health certainly to the vulnerable and elderly. The council have a moral duty here to the residents of Send Hill of which it is clearly treating unfairly.

I am sure no one would object to sensible planning or development of which this is clearly not.

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.
I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7350</th>
<th>Respondent: 15641569 / Trevalyn Gregory</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

5. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

6. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7353</th>
<th>Respondent: 15641569 / Trevalyn Gregory</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16384</th>
<th>Respondent: 15641569 / Trevalyn Gregory</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16385</th>
<th>Respondent: 15641569 / Trevalyn Gregory</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16383</th>
<th>Respondent: 15641569 / Trevalyn Gregory</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.</td>
<td></td>
</tr>
<tr>
<td>I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
With regard to commercial floorspace provision, I strongly object to this being sited at Garlick’s Arch. Commercial floorspace should be directed to existing employment areas of the Borough such as Slyfield, where there is sufficient space to accommodate the quantum of floorspace apparently required, rather than release greenfield land for development in a rural location.

Overall, whilst it is appreciated that new housing is required in the Borough, I question the need for new employment floorspace on the basis of the existing level of vacancies in the local area. I also strongly believe that the Local Plan should not be an opportunity for the Council to ride rough-shod over established planning policy without a careful and detailed assessment of all the alternative options for development.

I respectfully request that my objections as detailed above are taken into account in the context of the Local Plan Review.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/16386  **Respondent:** 15641665 / John Savin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

The National Planning Policy Framework (NPPF) (March 2012) confirms, at Paragraph 79, that ‘The Government attaches great importance to Green Belts…. The essential characteristics of Green Belts are their openness and their permanence.’ The NPPF clearly sets out at Paragraph 80, the five main and longstanding objectives of the Green Belt, as follows:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 83 of the NPPF states that:

‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’

Having reviewed the information available, and the details of the Council’s proposals to remove the village of Send from the Green Belt and amend the Green belt boundary, I consider that the Council’s approach is fundamentally flawed and that the proposed emerging local policy is at odds with National strategic planning policy, which should form the basis for policy formulation at the local level.

Furthermore, I consider that the Green Belt in this location continues to serve a purpose and fully meets the objectives originally identified for Green Belt designations, and in this instance:

- It checks the unrestricted northwards sprawl of Guildford, and eastward sprawl of Woking in particular;
- It prevents the merging of Guildford, Woking, Weybridge and Cobham in this area;
- It serves to safeguard land in the vicinity of the North Downs and land which is in a variety of rural and agricultural uses;
- It assists in preserving the historic character of the settlements in the area;
- The protection of the Green Belt assists in diverting development to more sustainable locations such as the built up areas of Guildford and Woking and other towns both within and outside of the Borough.

I consider that the Green Belt in this location still serves a strong purpose and that there is no over-riding justification for the release of land from the Green Belt in this location for development.

In terms of development in the Green Belt, the NPPF clearly states at Paragraph 87 that ‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances’. Paragraph 88 goes on to state that when considering any proposals for development Councils should ensure that substantial weight is given to any harm to the Green Belt. It also states that, ‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm, is clearly outweighed by other considerations.’ In this instance, the need for housing or commercial development is not sufficient a very special circumstance to warrant development in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/16387  **Respondent:** 15641665 / John Savin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore, I believe that there are other suitable alternative sites within the existing built up areas of the Borough that would be capable of addressing the development needs of the Borough in a more sustainable manner without irreversible degradation of the Green Belt.

Until the Council can provide a reasoned, robust and fully justified case for the removal of green field land from the Green Belt, then I strongly object to any Green Belt land release in the area of Send and Ripley, and as a result I also therefore object by default to the sites identified for development at Garlick’s Arch, Clockbarn Nurseries, Send Hill, Wisley Airfield and Gosden Hill.

In addition to the principal objection on the grounds of the impact upon the Green Belt, I also consider that there are fundamental and insurmountable issues associated with the capacity of the existing infrastructure in this part of the Borough, which wholly precludes further development of the level identified. Not only is the strategic highway network already at capacity at peak times, particularly on the A3, but the local network is also under considerable pressure, which I do not consider would be alleviated by the addition of a new A3 junction or piecemeal upgrading.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
### Comment ID: PSLPA16/3943  **Respondent:** 15642881 / Douglas Denham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Housing**

Your proposed housing numbers of 13,860 are impossibly high. How do you calculate these numbers – particularly after Brexit. The figures seem ludicrous and as officers you should explain them which you seem incapable of doing. This is worse than the civil servants in Brussels. I therefore object to all policies based on your housing figures. Housing policy should be based on real housing NEED for borough residents restricted necessarily by the requirement to preserve the Green Belt boundary. I further object to a Plan which requires 70% of housing to be built on the Green Belt – build modern nice flats on brown field land instead please. Brownfield land is available in the town centre. I would direct you to the open letter and brownfield site assessment sent to GBC councillors by Guildford Green Belt Group. I call on you to develop policies which require the use of urban brownfield sites first, which I believe can cope with real housing and commercial need and I object to your policies which do not do this (Policies H1,H2). The need for shopping and commercial space is declining with internet shopping and Guildford town centre should be revitalised with town centre housing. (Objection to policy E7).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Comment ID: PSLPA16/3944  **Respondent:** 15642881 / Douglas Denham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**East and West Horsley villages**

I **fundamentally object** to the inclusion of Kingston Meadows, land owned by GBC and previously dedicated as open space for the use and benefit of the community with Community Centre, medical centre and recreational facilities. It is fundamental that there are no exceptional circumstances for East and West Horsley to be taken out of the Green Belt. I **object** to the extension of the settlement boundaries by the redrawn insetting boundary. These can only be to try and make more land available for what has been shown to be inappropriate development and included in an enormous document so that they will probably be missed by residents. No change to the settlement boundary has been justified. I **object** to the inclusion in the Plan of six large housing sites in the two villages (A36 - 41). They should be removed from the Plan as they are contrary to the Green Belt and to include them pre-empts proper decision making. I object to a Plan which allocates Housing disproportionately to the Green Belt villages and in particular the Ockham, Send, Horsleys area. This is morally and legally wrong and contradicts your Vision. A proper assessment of urban brownfield sites should provide enough sites for housing to be allocated at least proportionately as between the urban area and villages.
I object to the revised Settlement Hierarchy with another meaningless tick box exercise. East Horsley is not a rural district centre within any ordinary meaning of the phrase. People do not come from outlying area to East Horsley for shopping or work, they go to Guildford, Dorking, Leatherhead or other urban areas, including Surbiton, Kingston and London. East Horsley is not suitable for town centre type developments and I object to these policies (E8).

I also draw your attention to the very serious existing problems in the village with inadequate infrastructure - roads, flooding and drainage, sewage, etc - and facilities - schools, doctors, failing businesses, no useful buses, to mention just a few. There is a high dependency on car use. For these reasons a large increase in housing is not feasible. It would also destroy the character of the village. For all the reasons given above, I am against anything other than small scale additions to housing in East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7356  Respondent: 15642881 / Douglas Denham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ockham - New Settlement

I strongly object to the proposal to use farm and previously requisitioned land at Ockham for 2,100 houses. The impact on the Horsleys would be enormous and completely change the character of the area and is unsustainable. Planning permission has recently been refused for numerous reasons and the site should therefore be removed from the Plan. Somebody is clearer making a lot of money out of this and it needs to be investigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16388  Respondent: 15642881 / Douglas Denham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Local Plan Consultation comments

I am writing to lodge some objections to the 2016 Draft Local Plan ('the Plan'). This may be your job but please realise you are affecting real peoples’ lives. Real people you are here to serve. This is not a game although people in this field of practice seem to treat it as such, largely to make money for the unscrupulous I suspect. What do you not understand about the words “Green Belt”? I know the educational requirements for many professions have changed but this is a no brainer and Green Belt is Green Belt whichever way you read it!

Green Belt

I strongly object strongly to the proposed changes to the Green Belt Boundary to inset the named villages from the Green Belt (including Policies S1, S2, P2). All the villages should remain in the Green Belt.

A requirement for extra housing is not exceptional circumstances – build up the way or underground instead of taking more Green belt land. 89% of Guildford Borough is in the Metropolitan Green Belt. The Local Plan should have the protection of the Green Belt as its cornerstone. The Green Belt is intended to be permanent and its boundaries cannot be changed except in exceptional circumstances. You have shown no exceptional circumstances under the NPPF for the Green Belt boundary to be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7366  Respondent: 15644225 / Patricia Savin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to commercial floorspace provision, I strongly object to this being sited at Garlick’s Arch. Commercial floorspace should be directed to existing employment areas of the Borough such as Slyfield, where there is sufficient space to accommodate the quantum of floorspace apparently required, rather than release greenfield land for development in a rural location.

Overall, whilst it is appreciated that new housing is required in the Borough, I question the need for new employment floorspace on the basis of the existing level of vacancies in the local area. I also strongly believe that the Local Plan should not be an opportunity for the Council to ride rough-shod over established planning policy without a careful and detailed assessment of all the alternative options for development.

I respectfully request that my objections as detailed above are taken into account in the context of the Local Plan Review.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16411  Respondent: 15644225 / Patricia Savin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition to the principal objection on the grounds of the impact upon the Green Belt, I also consider that there are fundamental and insurmountable issues associated with the capacity of the existing infrastructure in this part of the Borough, which wholly precludes further development of the level identified. Not only is the strategic highway network already at capacity at peak times, particularly on the A3, but the local network is also under considerable pressure, which I do not consider would be alleviated by the addition of a new A3 junction or piecemeal upgrading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16410</th>
<th>Respondent: 15644225 / Patricia Savin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to lodge my strong objection to the Council’s proposal to amend the Green Belt designation in the northern part of the Borough in the vicinity of Send and also the proposals to allocate land for additional housing and commercial development in this area.

Green Belt

The National Planning Policy Framework (NPPF) (March 2012) confirms, at Paragraph 79, that ‘The Government attaches great importance to Green Belts…. The essential characteristics of Green Belts are their openness and their permanence.’ The NPPF clearly sets out at Paragraph 80, the five main and longstanding objectives of the Green Belt, as follows:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 83 of the NPPF states that:

‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’

Having reviewed the information available, and the details of the Council’s proposals to remove the village of Send from the Green Belt and amend the Green belt boundary, I consider that the Council’s approach is fundamentally flawed and that the proposed emerging local policy is at odds with National strategic planning policy, which should form the basis for policy formulation at the local level.
Furthermore, I consider that the Green Belt in this location continues to serve a purpose and fully meets the objectives originally identified for Green Belt designations, and in this instance:

• It checks the unrestricted northwards sprawl of Guildford, and eastward sprawl of Woking in particular;
• It prevents the merging of Guildford, Woking, Weybridge and Cobham in this area;
• It serves to safeguard land in the vicinity of the North Downs and land which is in a variety of rural and agricultural uses;
• It assists in preserving the historic character of the settlements in the area;
• The protection of the Green Belt assists in diverting development to more sustainable locations such as the built up areas of Guildford and Woking and other towns both within and outside of the Borough.

I consider that the Green Belt in this location still serves a strong purpose and that there is no over-riding justification for the release of land from the Green Belt in this location for development.

In terms of development in the Green Belt, the NPPF clearly states at Paragraph 87 that ‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances’. Paragraph 88 goes on to state that when considering any proposals for development Councils should ensure that substantial weight is given to any harm to the Green Belt. It also states that, ‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm, is clearly outweighed by other considerations.’ In this instance, the need for housing or commercial development is not sufficient a very special circumstance to warrant development in the Green Belt.

Furthermore, I believe that there are other suitable alternative sites within the existing built up areas of the Borough that would be capable of addressing the development needs of the Borough in a more sustainable manner without irreversible degradation of the Green Belt.

Until the Council can provide a reasoned, robust and fully justified case for the removal of green field land from the Green Belt, then I strongly object to any Green Belt land release in the area of Send and Ripley, and as a result I also therefore object by default to the sites identified for development at Garlick’s Arch, Clockbarn Nurseries, Send Hill, Wisley Airfield and Gosden Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3952  Respondent: 15644577 / John Cotton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the lack of any evidence for the alleged housing need numbers. I have two sons, both of which have bought property as first time buyers in Burpham and then in Send and Ripley, it is never easy to buy property but it can be done. Many people would like to live in Surrey, that is why it is expensive, but we have chosen to live in Surrey for what it is now, not what it is planned to be.
<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Document</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPS16/7373</td>
<td>15644577 / John Cotton</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td></td>
<td></td>
<td>I OBJECT TO site A25 Gosden Hill - massive overdevelopment of 2000 homes in the Green Belt.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Attached documents:</td>
</tr>
<tr>
<td>PSLPS16/7374</td>
<td>15644577 / John Cotton</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td></td>
<td></td>
<td>I OBJECT TO site A35 Wisley Airfield - 2000 homes that are totally inappropriate and unsustainable development in the Green Belt.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Attached documents:</td>
</tr>
<tr>
<td>PSLPS16/7371</td>
<td>15644577 / John Cotton</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Comment ID: PSLPS16/7372</td>
<td>Respondent: 15644577 / John Cotton</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-----------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO the late inclusion of site A43 Garlicks Arch, and to site A43a the on and off ramp at Burnt Common, this will increase traffic problems in the villages, not help them!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16414</th>
<th>Respondent: 15644577 / John Cotton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO site A45 The Talbot. This is overdevelopment in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16413</th>
<th>Respondent: 15644577 / John Cotton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO any "in-setting" (i.e. removal) of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the local plan as the development proposed is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16415  Respondent: 15644577 / John Cotton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the disproportionate amount of development in one area of the Borough, which is bad enough, but when this development is considered along with what is proposed by Woking in adjoining areas, there is only one way of describing the situation proposed, "Ridiculous".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3968  Respondent: 15645057 / Julian and Clare Colborne-Baber  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

West Horsley sites:

With respect to the four sites located in West Horsley:

(i)  Policy A37 – Land at and to the rear of Bell & Colvill, Epsom Road, WH (40 homes / 1.4 hectare / 28.6 dwellings per hectare)
(ii) Policy A38 - Land to the west of West Horsley (Manor Farm, between East Lane and Long Reach) (135 homes / 8.4 hectare / 16.1 dwellings per hectare).

(iii) Policy A40 - Land to the north of West Horsley (Waterloo Farm at rear of Ockham Road North) (120 homes / 8 hectare / 15 dwellings per hectare).

(iv) Policy A41 - Land to the south of West Horsley (on East Lane) (90 homes / 4.8 hectare / 18.8 per hectare).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3970  Respondent: 15645057 / Julian and Clare Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure:

West Horsley does not have any of the infrastructure to support the development proposed. The village is small with few local facilities. There is currently just one shop at the southern end of the village, where local car parking is very limited. Most people in West Horsley already have to travel, largely by car, to East Horsley for their day to day shopping, banking and health needs. The existing car parking facilities in East Horsley are already at capacity and any increase in the local population will add to the already existing problems. Any new development would not “support the continued viability” of the existing village infrastructure, as has been noted by the GBC in the past. Key infrastructure issues include:

- Education that is already under strain;
- The East Horsley Medical Centre is already at capacity and serves both East and West Horsley and some other surrounding villages such as Clandon;
- The utilities infrastructure cannot be further stretched and water pressure is very poor across much of the village already;
- The existing road system is only appropriate for a semi-rural village, many of the roads are little more than lanes and pavements are often only on one side of a carriageway.

Any development will need immediate and considerable investment in infrastructure to support any increase in the village size.

In summary, whilst I accept that some housing development is required across the borough and West Horsley should take its fair share; at present the Local Plan proposes excessive development within West Horsley (in proportion much greater than other locations across the borough) the requirements for which have not been proven in any way. In addition the current proposals do not support sustainable development of the village and the amendment to the Greenbelt runs contrary to National Planning Policy.

As a result I am strongly opposed to the current Local Plan proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst I am not opposed to new housing in West Horsley per se; the scale of this proposed development in West Horsley is excessive and as set out above not reflecting need in any way. In particular I am most strongly opposed to site A41. This site is critical to West Horsley’s semi-rural identity and character and it is vitally important that this open green aspect is maintained through what is, in so many ways, the centre of the village. Adoption of A41 would enable this open space to become the only development of any significant depth along the whole of the southern side of the East lane / The Street corridor and would severely compromise this ‘green gap’ between the northern and southern parts of West Horsley.

This is contrary to at least two of the five essential purposes of Green Belt as defined at NPPF paragraph 80 (namely to check unrestricted sprawl and to assist in safeguarding the countryside from encroachment – functions which this part of the Green Belt, including this site, is recognised as performing at paragraph 8.2 of the Guildford Green Belt and Countryside Study).

This site had not previously been include as a potential development site within previous draft versions of the emerging Local Plan and assessment of this site, in background studies forming the evidence base for this Site Allocation, is based on incorrect information.

Two key incorrect bases are:

1. In the Guildford Borough Land Availability Assessment (LAA) 2016 – Page 388 in respect of site reference 2063 (“the site of East Lane”) it states under ‘summary of land designations’ – “Green Belt adjoining settlement boundary”. This is incorrect. Unlike any of the other three sites proposed in West Horsley, this site currently has no boundary that adjoins the village Settlement boundary as defined in the GBC Local Plan 2003.

1. Also, The Guildford Borough Green Belt and Countryside Study produced by Pegasus Planning Group, Volume III – Appendix VI – Sustainability Walking Distance Plans for Land Surrounding the Villages refers to the above site, plus the field beyond that the Council now propose removing from the Green Belt (together with a section of Lollesworth Wood) as site D. All assumed walking paths to (i) Nearest Local Centre, (ii) Healthcare Facility and (iii) Railway Station are presuming that access could have been gained to Lollesworth Lane via the undesignated (save that it has been proposed to be removed from the Green Belt) field to the south and fronting Lollesworth Lane. This field is currently used for grazing sheep and is owned by Mr & Mrs. Richard Wills of Lollesworth Farm and they have advised me and others that they would not permit such access route across their field, therefore the assumption used by Pegasus Planning Group is incorrect and may well have a material effect on their conclusions.

Furthermore, any development on A41 would not be consistent with the distinctive settlement pattern of the village and the important relationship between the built environment and the surrounding landscape (i.e. development on one side of the route only). In my opinion, it will harm important views of the village from surrounding landscape (from Lollesworth Lane) and from within the village of local landmarks (of Lollesworth Wood), contrary to Policy D4 of the Proposed Local Plan.

Allocation of the site will not “promote sustainable patterns of development” and the wildlife / environmental amenity loss of this site is likely to result in a significant detriment to the village’s character. Furthermore it will cause harm to the biodiversity and natural environment of the adjoining Lollesworth Wood SNCI. Indeed, this is contrary to Sustainability Objective 1 of the Sustainability Appraisal framework set out at Table 4.1 of the Guildford Borough Local Plan Sustainability Appraisal.
Policy I4: Green and blue infrastructure; states that “Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity.” Local Sites are earlier defined in the policy as including Sites of Nature Conservation Importance (SNCI).

Furthermore, there is no reason at all for the amendment to the Greenbelt behind the field beyond site A41 other than to prepare for a potential second phase development in the next Local Plan and surely it cannot be considered justified by “exceptional circumstances” when no alternative use is currently proposed and its current and historic use is as pasture?

I strongly object to the alteration of the Greenbelt around A41 and the field beyond and to the inclusion of A41 in the Local Plan.

Across any of the adopted sites in West Horsley, careful consideration must be given to the proposed density of any future developments. The current proposed density is not appropriate for such rural and semi-rural village location and are out of character for the village as it currently largely comprises low density housing, with a considerable mix of ages and housing styles.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPP16/16466  Respondent: 15645057 / Julian and Clare Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to write regarding the proposed local plan such that my comments may be taken into account. I live in the village of West Horsley as you will be able to see from my address at the bottom of the email and as such my comments primarily relate to West Horsley.

**Greenbelt:**

My first objection to the Local Plan relates to the protection of the Greenbelt. I am absolutely opposed to the removal of some of the village from the Greenbelt through the extension of the settlement boundaries and the insetting. No Exceptional Circumstances or other relevant justification has been demonstrated to justify the new Greenbelt boundary in West Horsley. National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. As such the proposal and Policy P2 is not in line with National Planning Guidelines. It is clear to me that it cannot be considered exceptional in order to facilitate the development put forward when a) The Guildford Borough Economic Strategy 2013-2031 makes no case for locating large numbers of homes in West Horsley (or neighbouring villages) (indeed the new economic development sites are located on the other side of the borough to West Horsley) and b) when the current proposals have given insufficient consideration of the use of brownfield sites within the borough (located much nearer centres of employment and supporting infrastructure). This is a key flaw in the Guildford Borough Submission Local Plan 2016 – proposing extensive development in locations remote from areas of employment and supporting infrastructure. The new housing should largely be allocated much nearer and around Guildford’s town and urban areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Housing Need:

With respect to the housing need, I do not consider that the case regarding the need for the proposed number of houses in Guildford borough overall has been proven, indeed the target house building programme proposed represents a 25% increase in the housing stock of the borough, whilst we have been advised that the Office of national Statistics (ONS) projects a population increase of some 15% for the borough of Guildford over the same period. With respect to West Horsley specifically the number of new houses needed has not been proven and the Local Plan number for West Horsley is simply excessive. The scale of proposed development (in proportion far greater than other villages within the borough) does not reflect the need and fails to respect the local character and existing building density of the village. I am therefore strongly opposed to the current site allocation and housing densities proposed for all four sites in West Horsley.

Furthermore, in my opinion, the Proposed Submission Local Plan’s proposal to make provision for 62% of this total dwelling requirement on land that is currently Green Belt is not justified. The disproportionate burden of meeting what GBC has chosen to define as its development needs is also proposed to fall on the more rural east of the borough. Within this eastern area, West Horsley is then allocated to bear an excessive proportion of this proposed development, despite the numerous countervailing reasons put forward in previous consultation rounds by many local residents (e.g. narrow roads; areas of flood risk; access to both senior and junior school places; medical facilities, parking availability at the station, etc.) If adopted, the draft plan will put an unsustainable pressure on all local resources and infrastructure.

As I set out earlier on, the Guildford Borough Economic Strategy 2013 – 2031 made no such case for locating large numbers of residential units within West Horsley. I am strongly opposed to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to express my concerns over the proposed 2016 Draft Local Plan and the impact it will have on East and West Horsley and neighbouring villages. Whilst acknowledging that more housing does need to happen and our village should be prepared to "do its bit" I object to the scale of what is being proposed which makes it significantly disproportionate. Three grounds in particular I would like to continue to bring to your attention and specifically object to:

1 **Building on Green Belt Land** should only be permitted in highly exceptional circumstances.

2 The biggest two proposed developments just don't appear to have been thought through in terms of the necessary infrastructure (schools, medical facilities and parking)

3 **Flooding**: in recent years it is has been very evident that the drainage system cannot cope so building on land already adversely affected by flooding will only exacerbate the problem

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

---

**Comment ID:** PSLPS16/7403  **Respondent:** 15645217 / Chris Luscombe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A15

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

I wish to register my objection please to the change in status of this site to C3 housing on the grounds as detailed well by Olive Edwards in her email below.

In addition I wish to raise that I have two young and we live in Scholars Walk - not a week goes by whereby we don't walk around enjoying the cathedral grounds. To lose that green open space would be a real loss to us personally as a family, forcing our children to play more in the streets which as a knock on effect would become less safe if we saw a significant increase in cars using Ridgemount.

**Policy A15 - land at Guildford Cathedral**

"This site was designated Protected Open Space in 2003 for good reason and I would say that it is even more important now to keep this area as a green space as every town needs to have several open spaces, particularly in light of current Government housing policy and the excessive degree of development in Guildford since that time.

A change of status would impact on the local community in terms of its local character, particularly for roads such as Ridgemount and Arlesford Road which currently have a semi rural feel to them as they are bounded by the ancient historic tithe hedge which forms part of the currently designated open space, as well as the visual quality of the site. The setting it provides for the Cathedral and the views of the Cathedral throughout Guildford as a whole ("a jewel in an emerald sea") will be irreparably damaged. I would therefore question the rationale for this change which seems to be based purely on the Cathedral's proposal to develop the site. It is evident that this site is not appropriate for building as due to its nature and
history of problems relating to subsidence and drainage, extensive piling would be required to accommodate any
development with consequent repercussions on neighbouring houses in roads such as Ridgemount, Arlesford Road,
Benbrick Road, Stag Hill, Scholars Walk etc. Furthermore the rainwater run-off from the site has caused drainage and
minor flooding issues, particularly affecting Ridgemount, which would be exacerbated by further development. It would
seem that the reason for change of status is political rather than based on the suitability of the site for housing, which it is
plainly not.

There is a well-documented major traffic problem in this area already which is only going to be made worse by the current
proposals for development of Guildford Park Car Park and Guildford Station. The addition of 100 houses on the Cathedral
hill site will add in excess of 100 vehicles to this already problematic scenario as well as having wider implications for the
immediate infrastructure of the neighbourhood.

In view of the vote to leave the European Union the housing need for Guildford is likely to change in the near future and
alteration of the current status of the site in question may well turn out to be a hasty decision to be later repented at leisure.

In summary I object to the change in status of this site to C3 housing on the grounds that it is inappropriate for development
due its nature and any development would have a negative impact on the surrounding community both in terms of impact
on the setting of the cathedral and the local infrastructure. I sincerely hope that you will take these points into
consideration during your deliberations on the status of the Cathedral hill site.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16475</th>
<th>Respondent: 15645377 / Linda Roberts</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to all erosion of the green belt.
I object to the “in setting” of any villages from the green belt as these villages are crucial to our rural way of life and building on the scale planned would destroy village life as we know it today.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3973</th>
<th>Respondent: 15645441 / Guy Willans</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate amount of development in this area of the borough.
I would urge you to re-think your strategy and not damage this beautiful part of our country where true village life means so much.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

I and my wife write to make points on the proposed Draft Guildford Local Plan.
The following are my thoughts, comments and objections to the Draft Guildford Local Plan:

1. The plan is based upon a supposition of a need for a 25% increase in housing by 2033 across Guildford Borough, which is not based on any fact, just assumptions which have been arrived at by questionable means.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. The proposed removal of villages from the green belt should only be undertaken in exceptional circumstances and there is no reason why GBC should unilaterally decide which villages should be inset from the green belt and make up their own 'exceptional circumstances'. No exceptional circumstances have occurred to remove West Horsley from the green belt as it has an open character and is historically important with many listed buildings, extensive wildlife and important countryside.
2. The infrastructure of West Horsley is already strained and stretched, including: drainage, schooling, medical facilities, road network, nursery places, sewers, risk of flooding, parking and rail transportation.
3. The extension of the settlement boundaries are simply not well thought thought and appear only to enable GBC to meet the expectations it is itself setting.
4. There are some sensible suggestions to utilise existing sites for new homes (Thatcher's hotel and Bell & Colvill), but this can not be undertaken without investment in infrastructure which is already poor.
5. The suggestion that Station Parade in East Horsley is a 'District Centre' is frankly farcical when the definition is read - it is just a small village street with a handful of shops, estate agents and a bank.
6. The Horsleys and immediate surrounding area seem to have a disproportionate level of proposed housing, with complete disregard for the green belt - this includes the suggested new settlement at Ockham (the former Wisley airfield).
7. Transportation via rail into London is already overcrowded with full station car parks and vehicle congestion at the station.

My wife and I feel very strongly that this whole draft GBC Local plan has been poorly thought through and has not been revised to any real extent since the last proposal.

We both oppose it due to the reasons laid out above. Housing is needed, and should be provided, but needs to be accompanied by significant infrastructure investment and there are many suitable sites across the whole of the Borough, including in the Horsleys that do not mean the removal of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16485</th>
<th>Respondent: 15645537 / Francis Garguilo</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The housing number of 693 is far too high. The SHMA calculations on how this number was reached have not been provided (and we have been asking for two years). Nobody in the council has checked it (or that is what the council have told us). Resident cannot check the calculation as GBC have refused to provide it. We are taking the number on trust from a company called GLHearn who represent developers, and boast on their website they solve developer problems. Constraints on the housing number NEED to be applied as allowed but have not been. Guildford is 89% Greenbelt, 44% Area of Outstanding Natural Beauty, yet our roads are gridlocked and that is TODAY. This plan will not fix that just make it worse that is 14000 houses at 2 cars per house... on our roads extra!

The transport evidence is very weak and major transport issues are unresolved e.g. another river crossing in the town, a central bus depot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16486</th>
<th>Respondent: 15645537 / Francis Garguilo</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Brownfield opportunities are being ignored, or assigned elsewhere – we need more homes in the town centre (not 40% more shops), and much more accommodation on campus for students, and homes for the elderly to free up family houses. The University needs to build the student accommodation it promised in 2003. The University impact needs to be allowed for and managed in this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Sewage and water provision risks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16484</th>
<th>Respondent: 15645537 / Francis Garguilo</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There should be NO BUILDING ON THE GREENBELT without local resident agreement. This greenbelt destruction is robbing the next generation of their heritage and driving up pollution and traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1826</th>
<th>Respondent: 15645537 / Francis Garguilo</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There has been no consultation with local residential bodies such as Resident Associations or Parish Councils.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/3978</th>
<th>Respondent: 15645601 / Peter Drew</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Please find below comments with regards to the proposed Guildford Local Plan, particularly with reference to the Horsley area.

**Removal of Horsley and other villages from the Green Belt**

I object in the strongest terms to this proposal.

The Green Belt is designed to prevent urban sprawl and in particular to prevent the spread of London into its surrounding areas.

The proposed removal of this essential protection from the key villages surrounding Guildford, will enable the loss of their unique character and enable them to expand into small towns, which will in turn create the feeling of significantly larger built up areas spreading out from London into its surrounding countryside.

This will significantly change the unique character of both the local villages themselves as well as the broader character of the Surrey area between Guildford and the M25.

The scale of development in this area as proposed in the Local Plan, with around 5,000 new homes highlighted for development in this stretch of Surrey, clearly indicates the desired direction of travel should this unique protection be removed. Once this essential protection is removed, it will also open up the path for further large scale developments in this part of our beautiful country in future years.

The Green Belt policy requires 'exceptional circumstances' to be proven before these areas can be removed from the policy and these exceptional circumstances have not been demonstrated within the plan.

This part of the plan should therefore be removed.

**Extension to the Settlement boundaries of the Horsleys**

Extending the settlement areas would also have the effect of expanding the size of the villages, contributing to the overall feeing of urban sprawl in Surrey.

**Scale of proposed development in the Horsley Area - impact on character and infrastructure**

I understand the need for further housebuilding in the South East.

However, this needs to be done with respect to the character of our local communities.

I do object the the scale of the development proposed for the Horsley area as this will have a significant impact on the character of the villages, the infrastructure - especially the roads, the schools and other amenities.

Our roads are already overloaded - for example access in the morning and evening to the M25 via the A3, the M25 itself, the A3 through Guildford. Access from Ockham Road South to the A246 in East Horsley is at best difficult, at worst dangerous each morning and evening. Traffic density makes it impossible for our children to ride on bicycles safely through the village.

Our schools are full and demand is predicted to increase further. Whilst there may be provision in the plan for further schools, there are no guarantees that these additional places will be created before the additional houses are built.

Other amenities will be put under sever strain by the plan, whilst at the same time local government spending has been tightened as a result of tough fiscal constraints by central government.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7417  **Respondent:** 15645601 / Peter Drew  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Scale of development at Wisley Airfield**

Priority is given within the plan to the development of brownfield sites, of which Wisley is one. My objection is not about the development of the site as such, but more to do with the scale of the proposed development. As mentioned above, the A3 / M25 interchange and M25 itself are at gridlock in the morning. The proposal to add this number of additional dwellings next to this interchange will only make matters significantly worse. Furthermore the impact of this number of houses on the other amenities and infrastructure within the area will be highly significant. A smaller, more reasonably sized or lower density development would reduce this impact to more manageable levels. This is particularly relevant when taken in conjunction with the proposed 2,000 houses for the Gosden Hill Farm and 400 at Burnt Common, just up the A3.

So in summary, the plan in its current format, would significantly impact the character of Horsley and its surrounding areas and well as have a damaging affect on its roads, schools and other amenities.

The plan needs to be revised to take a more balanced view between the need for further housing in the area and the hugely negative impact it will have on Horsley and its surrounding areas.

I urge, in the strongest possible terms that the Council and its elected representatives review the plan accordingly. **Most importantly, it is essential that the proposal to remove Horsley and surrounding villages from the Green Belt be removed.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/3983  **Respondent:** 15645825 / David Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of any immediate provision for new Doctor’s surgeries, the current ones already being under a severe load.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16510  Respondent: 15645825 / David Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the green belt.

I object to the “in setting” of any villages from the green belt as these villages are crucial to our rural way of life and building on the scale planned would destroy village life as we know it today.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16511  Respondent: 15645825 / David Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in this area of the borough.

I would urge you to re-think your strategy and not damage this beautiful part of our country where true village life means so much.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3990  Respondent: 15646689 / Mariette Hassell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have seen the recent plans for expansion of housing in East Horsley and surrounding areas, and have serious objections over the proposed plans. I struggle to accept that all the proposed areas in this draft plan would not severely negatively impact our village, its community and facilities.

I moved into this area because I wished my family to move into a village community. I do not wish for it to now become a town. The local amenities are only just enough to support the current village community - I have deep concerns about the lack of amenities being proposed to support such a large increase in housing. being schools, roads, drainage, trains, parking, to name a few. Even if these were to be improved to cater for a larger population, it will change the whole essence of living the village.

The land adjacent to my house (Weston Lea, area 1275) is currently used by our children's primary school, The Raleigh, for sports. Are we to assume the facilities for the local primary school are to be decreased to make way for more housing?! I would have thought it wiser to try to increase the school facilities, not the opposite!

In addition, I believe the land is currently left free to allow itself for being used as a flood plain. If housing is allowed in this area, I would need confirmation that any flood damage would be insured for and compensated for by the council, if it in any way impacted my house.

In summary I object to the following key issues:

1) **Schooling** - the current primary school is already over subscribed - I cannot see sufficient measures to support the increase in number of children that will need schooling in this area. This is also true of secondary schools - the Howard of Effingham School is also at capacity.

2) **Flood risk** - the flooding and surface water levels in this area are already of serious concern, and more housing will obviously seriously exacerbate this problem. I do not see sufficient measures are being proposed to address this.

3) **Medical Facilities** - again, already at capacity for this village - what measures are being taken to increase this facility?

4) **Transport, roads, parking** - the train service from Horsley would need to vastly improve, longer trains, more frequent trains, more parking for commuters. With a possible 6000 additional cars frequenting the local roads, the impact on roads and parking will be tremendous. The parking for the local shops, medial centre, & village hall will be over stretched. The roads are already in such poor condition that the increase in traffic will only make this worse. It looks from the plans in the SCC report that "further thought may be required to managing traffic" - this is an absolute necessity, not an afterthought!

I hope you can consider these objections, and come to the logical conclusion that this Draft Plan is insufficiently prepared, and cannot realistically be condoned, as it will have a huge negative impact on the local area in both short and longer term.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to record our objection to your proposed development of this site.

Our objection is made for the following reasons:

The removal of farmland,

The consequent traffic increase and delays on the A31,

The increased pollution this will cause to Guildford

The removal of an area of natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/5100  
Respondent: 15647137 / Geoffrey Lippitt  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16553  
Respondent: 15647265 / Keith Grainger  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. INFRASTRUCTURE

There is no credible plan to ensure that the local infrastructure can cope with the proposed population increases. Schools, medical and dental services are already at full capacity. The rail network is at capacity at peak times - station car parks are full with no alternative parking available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16554  Respondent: 15647265 / Keith Grainger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. TRAFFIC CONGESTION AND POLLUTION

Roads and country lanes are already congested at peak times. Increased traffic will result in more accidents and greater pollution. Many are already unsafe for cyclists and pedestrians. For example, Ockham Road South is narrow for the volume of traffic it carries, is dangerous to cross and the pavement is unsafe for pedestrians in a number of places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16551  Respondent: 15647265 / Keith Grainger  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the draft local plan on the following basis:

1. PROTECTING OUR GREEN BELT

There are no exceptional circumstances to justify the removal of East and West Horsley from the green belt. The green belt exists to protect the country environment of these historic villages for current and future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4009</th>
<th>Respondent: 15649345 / Matthew Sarti</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In respect of the 2016 Local Plan public consultation I, Matthew Sarti make the following comments.

1. I OBJECT to the 2016 local plan in its current format. I do not believe that it is sound and is not yet fit for implementation.

a) The council relies on a strategic housing making assessment that is in question. The council have not scrutinised the figure provided and rely purely on the fact that other councils have used the consultant GL Hern to assess the housing need. The SHMA appears to be exaggerated against ONS data. Two independent reviews have identified similar faults, which suggest that the figure is too high and inaccurate. They also identify that the recent referendum result relating to Europe may have an impact on economic growth and consequently should be reviewed. The objectively assessed need (OAN) upon which the council housing figures are based on the SHMA, until this is properly reviewed the numbers are unacceptable.

b) The council have chosen not to impose any constraints in respect of the OAN.

1. The Council have rightly identified that the borough has 89% greenbelt but has chosen not to consider this as a constraint. Approximately 65% of new development within the borough is proposed within the greenbelt.

2. The council appropriately identifies that the enhancement of the A3 is essential to the scale of development possible within the local plan. Page 21 Strategy and sites states 'The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford'. Highways England have made no commitment to improve the A3 and yet the local plan still seeks to deliver the full housing target through the delivery of three of its four strategic sites sighted directly beside the A3. The transport survey also highlights that traffic will be impacted and congestion worsened irrespective of what improvement measures are put in place.

c) Several aspects have not been fully considered prior to its publication for consultation. One example is the recent proposal by the Raleigh school to move sites and build a larger school to meet the needs of the community. This is much needed but failing to include it within the local plan has prevented early and effective consultation on the sites with clear information on what they will include and the potential for provision of proper and essential infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/4010  Respondent: 15649345 / Matthew Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the use of the ‘Green belt and countryside study 2014’ within the evidence base. This is a subjective view of the green belt provided by one company, It is not evidence. It does not provide exceptional circumstances to remove land from the green belt. It was first commissioned without reference to councillors and has not been subject to full scrutiny due to its size and the time necessary to do so.

2. I OBJECT to the use of the transport study within the evidence base. The SINTRAM model is designed for major routes and is not suitable for local roads as it takes no account of junctions. The three hour period also skews the data disproportionately downwards. This means that it will not necessarily provide a true reflection of traffic movement within Guildford. A different model should be used and the peak times adjusted to accurately reflect traffic, particularly within rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4011  Respondent: 15649345 / Matthew Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. OBJECT to the fact that the Local plan does not effectively demonstrate proposals to improve road and networks to accommodate the additional vehicles likely to travel through the borough. The transport strategy includes policies that are non specific and untested.

a) LRN7 intends to introduce interventions to address potential highway performance issues resulting from the development of Wisley airfield. If these are those put forward by the developers they are likely to have a significant negative impact on East and West Horsley, or any traffic travelling to or through even without additional housing.

b) LRN22 East and West Horsley traffic management and environmental improvement scheme is non specific and the suggested £1m is insufficient to deal with the substantial traffic increase likely if all aspects of the local plan are allowed. The Horleys are serviced by roads that are effectively single track roads with pinch points that allow only one vehicle to pass at at least one point. It also suffers with flooding causing several roads to be closed at least once a year during heavy rain.

1. I OBJECT to the fact that the transport plan uses mitigation suggested by developers as its policy to deal with public transport and sustainability without absolute guarantees that they are deliverable.

a) BT2 and BT3 relating to Wisley airfield were in dispute at the point of their planning application.
b) AM3 Offsite cycle network from the land at the former Wisley airfield to key destinations was proposed but recognised by the planning committee as being inappropriate due to the distances involved, the speed of traffic and narrowness of roads and footways. These roads are not suitable for average user to commute on a regular basis. Its inclusion is misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4012  Respondent: 15649345 / Matthew Sarti  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17. I object to West Horsley (south) [as described within the local plan] being removed from the green belt. This clearly meets the description of a village that should be 'washed over' by the green belt in terms of size, appearance and character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7468  Respondent: 15649345 / Matthew Sarti  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of A25 Gosden Hill Farm development within the local plan. This development is within the Green Belt and no exceptional circumstances are evidenced. It also reportedly relies on the new Guildford East station to prove sustainability. Network Rail have not commissioned or agreed to developing or servicing this. The site will have a significant impact on the A3, which the Council notes to be a potential blocker to achieving the local plan in its entirety. It will also have a devastating affect on Burpham, which already struggles with too much traffic and congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7470  Respondent: 15649345 / Matthew Sarti  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the inclusion of development A26 Blackwell Farm within the local plan. It is a green belt site and no exceptional circumstances have been proved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7465</th>
<th>Respondent: 15649345 / Matthew Sarti</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. In line with Central Government guidance I OBJECT to development on areas of high agricultural value. This includes Wisley airfield. If it is necessary to build on agricultural land it should be of low quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7467</th>
<th>Respondent: 15649345 / Matthew Sarti</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of A35 Wisley airfield in the local plan. The principle of the local plan is a presumption in favour of sustainable development. The Housing and Planning Act 2016 grants permission in principle to any development included within the local plan leaving only technical details to be considered by planning authorities. The site at Wisley failed in its planning application on a large number of points including infrastructure and sustainability. It is highly unlikely that these will be met in the future due to its positioning. Part of the site is green belt and no exceptional circumstances have been demonstrated. Aspects of the site also include high quality agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/7466  Respondent: 15649345 / Matthew Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of Policy A41 relating to land south of East Lane. This is in contravention of para 85 NPPF which states that borders must clear and readily recognised. The natural border is the wood to its east. The inclusion of this site is out of kilter with the current settlement and character of the village; houses front East Lane up the woods to the east of this site which borders the road for approximately 400 yards. The land is green belt, no exceptional circumstances are made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7469  Respondent: 15649345 / Matthew Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Garlicks Arch development A43, which will place unnecessary strain on local infrastructure and has not demonstrated exceptional circumstances to alter the green belt. The site also includes ancient woodland, is subject to flooding and currently supports the rural economy through small businesses. It will particularly increase traffic through West Clandon accessing the A3 and M25. This site is billed as being an enabling site due to its potential to provide an on and off slip for the A3 north and southbound respectively. This has not been agreed by Highways England, may not be in the best location and will not be progressed until some time after Garlick's Arch has been developed due to the finances required, thus impacting on the road network substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |
| 1. I object to the inclusion of policy A46 Normandy/Flexford within the local plan. The site is green belt, the number of houses appears disproportionate to the area itself. The only exceptional circumstances that could apply to this site is the building of a school, however this would be predicated on the basis of a housing number that may be incorrect and should be subject to constraints including building on green belt itself. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/16629  Respondent: 15649345 / Matthew Sarti  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |
| 1. I OBJECT to the fact that there is no provision for a larger primary school within East or West Horsley despite the fact that Para 38 NPPF states that for large developments a primary school should be built within walking distance. Over 500 houses within East and West Horsley is large development when considering the size of the villages. The Surrey infrastructure review does not state that a new school is necessary despite the fact that the school is already oversubscribed causing children to be driven to other villages. (They do state the school may in the future identify a suitable site through infill opportunities). Surrey have suggested that children from the Horsleys can be accommodated either in Ripley or Clandon; both of which would necessitate parents driving, and in the case of Ripley travelling through a traffic blackspot. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/16627  Respondent: 15649345 / Matthew Sarti  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): ( ) |
1. I OBJECT to altering the green belt boundaries. Para 83 NPPF states green belt boundaries can only be altered in exceptional circumstances and where there is local support. Meeting the housing need is not exceptional circumstances. This has recently been reiterated by Central Government. No exceptional circumstances have been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16630   Respondent: 15649345 / Matthew Sarti   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the local plan making East and West Horsley less sustainable. This is breach of para 7 and 9 NPPF and policy S1 of the proposed local plan. Failing to provide essential health, education and community facilities forces residents to use private vehicles to reach these when at present the majority can walk. The Infrastructure survey suggests that primary and junior school aged children will have to travel to Ripley and Clandon to attend school. No provision is made for any other facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16628   Respondent: 15649345 / Matthew Sarti   Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the disproportionate amount of development in this small area of the borough; The area surrounding Clandon and Horsley (including these wards) will attract in excess of 5000 new homes, which accounts for over thirty-six percent of development. The area is predominantly rural in structure, nature and environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4023   Respondent: 15649601 / Laura Bushnell   Agent: 

Page 1054 of 2988
I strongly object to the removal of both the Horsleys and other surrounding villages from the Green Belt. The primary purpose of greenbelt land is to prevent urban sprawl surrounding large urban centres. There are already near continuous buildings stretching from the City of London to Effingham Junction and it seems only reasonable to conclude that with the proposed rate of development and the removal of Green Belt status, this will extend to Guildford and beyond, thus removing the beautiful surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I support Policy E5 on the rural economy in favour of and while strongly objecting to Policies E8 and E9 on new District and Rural Centres. Proposals to make East Horsley Station Parade a District Centre as well as Bishopsmead Parade a Rural Centre are completely inappropriate for the local small village which should not be expanded. I understand the plans are to ensure economic resilience however proposals within Policy E5 for better broadband and mobile phone coverage, agricultural diversification and to support sustainable growth of appropriate scale for all businesses in compliance with green belt policy are far more sustainable options which are place-appropriate. This is provided Horsley, as well as many other villages, stay within the Greenbelt as I strongly object to Policy P2. Policy E8 proposes consideration of sites on the edge of district centres for town centre uses to which I strongly object, as it opens up further expansion possibilities in the future, pathing the way for further housing plans outside in the countryside. Such expansion is creeping urbanization, damaging to the Green Belt as well as to Guildford’s thriving urban hub. Past expansion of suburbs both in London in the mid-20th century as well as American cities demonstrate how suburbanisation and consequent urban flight contributes to urban decay. The council has no business facilitating new supermarkets in the Green Belt as retail capacity should be left to local demand. Meanwhile the policy does not show any support for existing rural shops and services which are fundamental to the village communities which would be put at a disadvantage if these proposals were to go ahead. I object to Policy E9’s proposals for retail development adjacent to rural centres such as Bishopsmead Parade, especially when just down the road is proposed to become a District Centre (Station Parade), as well as neighbouring Effingham and beautiful village Shere. Expansion in Shere would be detrimental to its tourist industry as well as site locations for various tv and filming, chosen for its stunning scenery and ‘typically British’ quiet country village community location. Such locations are becoming rare to find in the South East of England and it is a popular location for both Londoners for a day out as well as people from across the world. It would be a great shame to lose this beauty and for the local people who rely on the income generated from tourism in the area.

In addition to my aforementioned objection to site reference A36, I also object to any significant increase in the number of villages of East and West Horsley or in the surrounding neighbourhoods. In particular, I object to the proposal of 2,000
homes at former Wisley Airfield (Ref A35) and the further 2,000 homes at Gosden Hill Farm (Ref A25). These two sites will cause huge further pressures on the Horsley villages and I do not believe the villages are capable of supporting and withstanding such pressures including on the road system, rail network, parking, flooding, drainage infrastructure, facilities such as the medical centre, dentists and chemists which are already very busy, local schools and many more. Therefore, I object to Policy S1 in that it fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7493  Respondent: 15649601 / Laura Bushnell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition, the open space naturally enhances the beautiful landscapes and preserves the unique character of smaller historic towns and local landmarks. The Guildford Borough Council’s Draft Local Plan seems in danger of destroying the character of historic villages such as Shere, National trust properties such as Hatchlands and local landmarks such as Horsley towers, to name only a few. I particularly object to the site at Thatcher’s Hotel (Ref A36) due to the proximity to the beautiful local landmark of Horsley towers and the preservation area surrounding it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16872  Respondent: 15649601 / Laura Bushnell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D3 on historical environments. The policy is in contradiction to the idea of preserving our heritage and history, instead pledging to “support development” that might “enhance” sites of historical value, leaving room for commercial abuse and financial leveraging. This appears to put economic value over sentimental value, which is important in maintaining a sense of community. The site at Thatcher’s Hotel (Ref A36), for example, intrudes on the setting of Horsley Towers, a valuable site of local heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy D4 on Urban Development. The proposed supply for affordable housing is not meeting the demand where it is needed the most: in urban areas. Social housing is needed where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors nearby. Instead the Draft Local Plan focuses on building homes on greenfield sites over regeneration of urban areas with 8,086 new houses planned for the Green Belt, but only 1,135 for Guildford urban area. This fails to meet the housing needs within the town and is unsustainable as it leads to increased road traffic into town centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16684</th>
<th>Respondent: 15649601 / Laura Bushnell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Increased pollution

The Green Belt acts as a physical barrier between the urban areas and the countryside, resulting in improved air quality in urban centres and the loss of such valuable green spaces will lead to the irreversible loss of a carbon sink for air pollution. In addition, the proposed number of houses will inevitably lead to a significant increase in the volume of traffic, increasing the levels of nitrogen dioxide and particulates in the environment, hence exacerbating an area of concern already present in several areas of the Borough.

In addition to my objection to site reference A36 as mentioned above, I also object to any significant increase in the number of dwellings in the villages of East and West Horsley or in the surrounding neighbourhoods. In particular, I object to the proposal of 2,000 homes at former Wisley airfield (Ref A35) and the further 2,000 homes at Gosden Hill Farm (Ref A25). These two sites will cause huge pressures on the Horsley villages and I do not believe the villages are capable of supporting and withstanding such pressures. My concerns are outlined below:

Pressure on road system

The roads in the villages of East and West Horsley are currently not maintained to a desirable standard. Hence, it seems reasonable to anticipate that any increase on the current number of users could only cause these stretches of road to deteriorate more rapidly. With the proposal of large nearby sites such as A35 and A25 as well as many new developments within the villages themselves, many of the roads could be required to take on hundreds of new users. Many of these roads are narrow and often in poor condition and hence heavy traffic and large vehicles, such as lorries or tractors, will cause these roads to become congested and dangerous. Furthermore, there are often narrow or non-existent stretches of pavement along many of these roads which will become even more dangerous for all users, in particular the elderly, wheelchair users and pushchairs. In the majority of cases, there is no potential to expand these roads or pavements.

Pressure on rail network

As a commuter to London, I have experienced many overfilled trains at peak times and hence an increase in the commuter population could only exacerbate this problem.

Pressure on parking

Parking at Horsley and Effingham Junction stations is already at capacity at peak times with the current number of users and so a significant increase in users is likely to heighten this problem. Additionally, there will be further strain on the parking at the shops, medical centre and village hall in the centre of East Horsley. There are many elderly residents in both villages and it is of great concern to me that they may not be able to access parking spaces sufficiently close to the services they require with this increase in demand.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16672  Respondent: 15649601 / Laura Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have outlined below some of my main concerns regarding the removal of Green Belt status from the proposed villages:

Loss of valuable open space

I object to the loss of open space which will result from the Countryside, Green Belt and Surrey Hills Area of Outstanding Natural Beauty (AONB) policies. Access to open space provides numerous educational and recreational activities and hence the loss of such land will lead to the irreversible loss of rural leisure and tourism amenities, profitable film locations and room for public facilities such as parks and burial grounds. The numerous beautiful open spaces in the area have led to it becoming one of the most popular areas of the country for road and off-road cycling, even attracting events such as the annual Prudential RideLondon and the 2012 London Olympics. These events, as well as many further small-scale cycle events demonstrate the popularity of this area as being both rural and accessible from London and they contribute hugely to the local economy. The loss of open land in this area could therefore be detrimental to this and many similar recreational activities, forcing people to go further out from London or Guildford to find the open space they desire.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16681  Respondent: 15649601 / Laura Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Negative impact on wildlife and biodiversity

Building on the Green Belt will inevitably lead to an irreversible reduction in biodiversity and due to the proximity to the Surrey Hills AONB, this should be a major cause for concern. Many species, such as the Dartford Warbler and Red Kite, currently found in this area are already highly vulnerable and therefore the loss of greenbelt land as well as the increased volume of people and traffic will only worsen this. In addition, a significant increase in the human population will inevitably lead to an increase in the predatory cat population which will cause further losses amongst these species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16874  Respondent: 15649601 / Laura Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P1 on Areas of Outstanding Natural Beauty. The proposal significantly weakens protection of the AONB and the AGLV from the previous draft plan. Access to open space provides great educational and recreational value and therefore, the loss of such land will lead to the irreversible loss of rural leisure and tourism amenities. The natural beauty of the area have led it to become one of the most popular in the country for road and off-road cycling, even attracting events such as the annual Prudential Ride London, Tour of England and the 2012 Olympics. Events such as these demonstrate the of this area as being both rural and accessible from London and they contribute hugely to the local economy. Hence, the loss of open space would be fatal to this and many similar recreational activities, forcing people further out from London or Guildford. The wording of the proposal makes it available to abuse from developers keen to use it to their advantage, and to our disadvantage. Proposals to consider developments on an individual basis almost encourages development applications. I would like a guarantee for further protection of the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16875  Respondent: 15649601 / Laura Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to Policy P2 on the Green Belt. I am extremely disappointed to hear that my local area, Horsley, as well as many surrounding villages will be removed from the Green Belt. The primary reasoning behind the greenbelt land is to prevent further urbanization surrounding large centres for many reasons, including environmental as well as economic. Near continuous urban sprawl stretches from the City of London to Effingham Junction already, so it seems only reasonable to conclude that with the proposed rate of development and removal of Green Belt protection that this will only keep spreading. Is there other land elsewhere that is to be added to the Greenbelt to be protected from this creeping urbanization? Or will the Greenbelt simply shrink until it no longer exists? When will the people living in that land get to the time when they will have to write objections, as I am now, to protect and save their local area?

Indeed, the Green Belt constitutes 89% of the borough and should be the foundation of all local planning policy, yet support for it is half-hearted at best. It is not only beneficial to our borough but to Londoners and the country too, so it is important to consider the wider consequences as well. Once it is gone, it is gone forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16685  Respondent: 15649601 / Laura Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flooding

The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and so building on such land will only exacerbate the problem. There are already many issues with overflowing drains on the local roads in this area when it rains.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16669  Respondent: 15649601 / Laura Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to object to some aspects of Guildford Borough Council’s new Draft Local Plan and have outlined some of my concerns below. My primary objection is to the fact that 65% of new houses in the Borough are to be built on land that is currently in the Green Belt. Furthermore, I am disappointed to learn that the comments made with regard to the 2014 Draft have not been taken into consideration, as evidenced by the fact that the number of planned houses has risen from 652 to 693 per year over the next 20 years.

One of the main benefits of the Green Belt is to force better land use within the urban areas surrounded by greenbelt land, as developments in the Green Belt should only be accepted in rare circumstances. However, since 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area, I am not convinced that Guildford Borough Council have demonstrated that they have maximised the potential of Guildford urban area, thus I cannot see the necessity for the irreversible loss of the greenbelt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16871  Respondent: 15649601 / Laura Bushnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to some aspects of Guildford Borough Council’s new Draft Local Plan, to which I have outlined below.

My main objection is to the fact that 65% of the new houses planned are to be on land under current Green Belt protection which should not be lost. Additionally, I am very disappointed that the comments made in regard to the 2014 draft have not been taken into account, as evidenced by the fact that the number of planned houses has risen from 652 to 693 a year over the next 20 years.

While I agree that sustainable development is of fundamental importance, the Councils proposals for sustainability through a focus on CCHP in Policy D2 are simply not enough to compensate for the consequent traffic generation and carbon dioxide emissions from building 650 new homes a year in the Borough, with 1,500 people who will need transport in such an environment in the Horsleys alone which encourages this increased car usage. Not only will increased traffic increase carbon dioxide emissions, increased waste generation, deforestation, energy usage within homes and new District and Rural Centres (Proposals E8 and E9) will lead to greater greenhouse gas emissions. The Green Belt is also important environmentally for its location surrounding London, as it acts as a physical barrier resulting in improved air quality within the urban centre. With considerable note of Areas of Outstanding Natural Beauty within Guildford Borough, our local ecosystems and wildlife will suffer irreversible damage through reduction in biodiversity. Many species currently found in this area, such as the Dartford Warbler and Red Kite, are already at high risk and therefore the loss of the Green Belt land, combined with urban sprawl will lead to even further loses amongst these species. Of particular local concern is the site at Thatcher’s Hotel (Ref A36), directly adjacent to Horsley Towers conservation area. With more people near the conservation area, trampling, pollution and litter, to name a few, are serious threats to the habitats and local wildlife living there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: PSLPA16/4027  Respondent: 15649825 / Chris Howes  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

I am writing to provide my comments on the Local Plan.

I support the Guildford Residents Association (GRA) response to the Local Plan and oppose Guildford expanding by a quarter.

Particular points are in my view:

- Flawed evidence is exaggerating the need for expansion, as shown clearly by the GRA report on housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPA16/4031  Respondent: 15649825 / Chris Howes  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

- It is a matter of choice by our Council that it is proposed that Guildford would expand on this scale. Some sensitive measured development probably would be supported but the scale of what is proposed in the Plan is far from that. Why have the Council not constrained the numbers?
- There seems to be a conflict of interest with the company which provided the details on which the Plan is based as they have connections with developers who have an interest in the flawed conclusions which are being drawn.
- It is not clear why the Councillors have made a political choice to open the floodgates to expand Guildford on the damaging scale proposed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPP16/16714  Respondent: 15649825 / Chris Howes  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

---

Page 1063 of 2988
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

High density development would erode the character of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16713  Respondent: 15649825 / Chris Howes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Transport evidence is not yet fit for use and major transport issues are unresolved, e.g. another river crossing, a central bus facility.
- Even if all the proposed highway improvements in the Plan were built, congestion would not improve. There would simply be a lot more people stuck in traffic. Traffic would get a great deal worse with more traffic from the major development sites coming in on the Epsom Road and London Road.
- Central routes being closed to through traffic, pedestrianised or used for development would make central roads busier than ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16709  Respondent: 15649825 / Chris Howes  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I oppose unjustified Green Belt development.

• It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16704</th>
<th>Respondent: 15649825 / Chris Howes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Expansion should be constrained to protect the character of town and country in our congested County Town.

• It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16706</th>
<th>Respondent: 15649825 / Chris Howes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16711</th>
<th>Respondent: 15649825 / Chris Howes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: SQLP16/1839</td>
<td>Respondent: 15649825 / Chris Howes</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>---------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Brownfield opportunities are being ignored. We need homes in the centre, not 40% more shops, much more accommodation on campus for students and homes for the elderly to free up family houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7505</th>
<th>Respondent: 15649889 / Alan Hughes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The Plan is unsound and unsustainable.
- The Plan is not ready for an inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Any development at "Gosden Hill Farm" needs a 4 way interchange on the A3 road, close to Burpham's slip road, this is planned from 2021 but is out of kilter with an aspirational "Guildford Tunnel" which if done is likely to be in this area, will not be delivered until 2023 -2027; so there will be a period of intense traffic overload in Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16728</th>
<th>Respondent: 15649889 / Alan Hughes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Build smaller homes for first time buyers and/or for the elderly to free up larger family homes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do not rely on a system where developers build large homes to finance smaller ones. Build social housing out of Government funds now.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16726</th>
<th>Respondent: 15649889 / Alan Hughes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Green Belt</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Most of the aspirational development on this draft plan are in Green Belt and no justification to change the existing area has been made.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16727</th>
<th>Respondent: 15649889 / Alan Hughes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I would like to see more brownfield sites used for homes in the town centre and not a focus on retail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/16725  **Respondent:** 15649889 / Alan Hughes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

**Housing Numbers**

There is no sound justification for the increased estimate of housing numbers from the last draft plan in 2015.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/16746  **Respondent:** 15650017 / Scott James Harris  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I would like to formally object to the removal of green belt protection from a number of villages in the Guildford area, as proposed in the Guildford Local plan 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/4040  **Respondent:** 15650145 / Paul Iverson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council Local Plan sites A46 and A47

I am writing to protest against the suggested large scale housing developments in Flexford and Normandy. The present population of Normandy at the 2011 census was 2981 and the proposed large scale developments double the population. I believe Normandy would no longer be a village and would become a commuter suburb of Guildford without its own identity.

I think the proposal to build over 1,000 houses will ultimately prove to be an embarrassing mistake that will incur substantial costs to rectify. I understand you require supporting rationale and while my thoughts may be similar to other Normandy residents, this is only because we share the same opinions.

My first concern is the proposal to build a secondary school as I don’t believe there is a need. I understand other secondary schools in the local area have spare capacity and are willing to expand, should future needs require greater capacity. Under capacity schools don’t appear to be a good use of limited funds and I’m not convinced they would provide the best education for the children. I understand schools work on local catchment areas but parents request places for their children based upon good school reputation, facilities, safety and a whole range of other criteria.

Linked to the provision of a new school would be the access and additional traffic on the local roads. Glaziers Lane and Westwood Lanes are both “lanes” and are fairly narrow “c” category with a railway line crossing either over or under the road. Westwood Lane has a low bridge with a height restriction that cannot accommodate double decker buses or high sided lorries. Traffic is also limited to one vehicle at a time and traffic accidents affecting rail bridges have a detrimental effect on rail traffic.

Glaziers Lane has a road bridge over the railway with a bend on its apex where you cannot see vehicles approaching until either of you reach the top. Increasing traffic volumes will increase the likelihood of road traffic accidents and again these could affect the Reading to Gatwick railway line. I believe this railway bridge has just been repaired after cracking caused by heavy vehicles travelling over it.

I assume the roads would need to be widened and upgraded to accommodate the increased traffic, I don’t know whether this would be possible where the railway crosses the roads or whether this just creates pinch points.

The Guildford Road to the North of the proposed site is currently busy and there is already congestion if there is an accident on either the A31 Hogs Back or the A3. There is also congestion where parents take their children to school by car and when road works are necessary. Adding a secondary school, let alone 1,100 houses will cause daily congestion, further road traffic accidents and serious injuries. Recently a motorcyclist lost his life near to the church hall where flowers and candles are a constant memorial.

I work for a local insurance company that pays millions of pound per year following serious flooding and the Normandy site already has issues without a substantial new development. The soil doesn’t drain well and there is already a stream that runs East/West across the site. I know through my work that new housing has ensuite, bathrooms and downstairs toilets. I also know that concrete foundations, access roads and paved driveways add to surface water run off that will overload the existing drainage and sewerage systems. This is already a local problem but should the flooding deteriorate, this could affect property prices and the availability of affordable insurance. Whether residents would seek compensation from the Council for their financial losses would depend upon individual circumstances.

The water supply and drainage services would need to be upgraded as would the electric supplies as most of Normandy has overhead power lines. We are subject to frequent power cuts during stormy weather and while the developments planned would probably have underground cabling the electricity supply would still be unreliable unless the rest of the village...
overhead lines were replaced. To upgrade the electricity supply by underground cabling would be a very major and costly project.

I am no expert on the local wildlife although I understand Normandy is situated in the Green Belt with ancient woodland and grassland areas within the village boundaries. Surveys have revealed a diverse ecology and a large scale development would destroy many species as well as removing vital “green corridors” needed by the animals. I am told that both A46 and A47 sites have populations of hedgehogs, foxes, badgers, water voles, little owls, yellow hammers, sparrow hawks, fieldfares, red kites, slow worms, adders, grass snakes, frogs, toads, great crested newts, as well as many more common species like robin, sparrows, blue-tits, great tits, coal tits, starlings, blackbirds, collared doves, wood pigeons, house martins. Only last night I watched a couple of bats flying and feeding in my back garden.

I also understand Normandy Common and Normandy Pond are designated as SNCI areas so it would be irresponsible and irreversible if we were to lose our fauna and flora. It would also remove part of our green and pleasant land where villagers enjoy walking, relaxing and unwinding after a busy and stressful day at work.

I acknowledge the need to build more housing to meet the need of the population and am not against utilising brown-fill sites or very small scale developments. However, I must object strongly to the large scale developments planned for Normandy and Flexford for the reasons already given. It is simply not the right location for a development anywhere near this size.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

1. The Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notably roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

1. Having properly applied constraints if there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the Plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7529  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 Gosden Hill Farm.

1. The Green Belt at this point serves the important function of separating the parish of West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce, defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and the houses along The Street in West Clandon (owned by the same developer as Gosden Hill Farm) will come under enormous pressure. Since the 2014 Draft Plan was withdrawn, the area under consideration has been enlarged in the direction of West Clandon.

1. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a slip road provision at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
1. The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

1. The development will overburden the local road network and increase congestion on the A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A-road. In places it is under 5m wide and too narrow for two lorries to pass causing them to mount the pavement (see also below).

1. I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon-a road which is already under traffic stress (see also below) and which Surrey County Council say cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7530</th>
<th>Respondent: 15650369 / Stephanie Dean</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Policy A43 and A43a on Garlick’s Arch.

This site had been previously considered and rejected before the previous draft of the Plan. The site was then inserted in the Draft Plan only hours before its publication without any consultation. I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site. This is a cavalier approach to public engagement by the Council.

1. The site is not a sustainable site, being far from any infrastructure facilities and transport links. The bus service is infrequent and future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

1. The site is susceptible to flooding and development will cause harm to the ancient woodland on and near the site. See my comment on Policy P4 above.

1. The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

1. The Council appears to view the development as an enabling site to obtain land and developer funding for slip roads on/off the A3. This is not an exceptional circumstance to justify taking Green Belt land. The slip road land if needed could be safeguarded in the Plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so
called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential, Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

1. The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A-road. In places it is too narrow for two lorries to pass causing them to mount the pavement, often at speed. (During the last week of the consultation period of this Plan, a resident of West Clandon had his car written off by a negligent car driver coming the other way and occupying 2/3 of the road at an obvious pinch point which is typically littered with broken wing mirrors.) It has narrow bends with poor sight lines, a primary school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for cyclists and pedestrians.

1. Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford. There is vague talk in the plan of link roads between Gosden Hill and Garlick’s Arch, all meeting at an enlarged A3 intersection at Burnt Common. The existing intersection is unlit and is accident prone. Adding two or three slip or feeder roads at this point will add to the confusion and public danger.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16774  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets. Taken together with the current Council policy of “sweating assets” I fear this policy leaves too much room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16775  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
**POLICY D4 - Development in urban areas and inset villages**

I object to this policy on the following grounds:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt, and the per person infrastructure investment can be reduced, e.g. fewer pavements, sewers, utility ducting per household than in the open countryside. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development. Living in a town with good access to public transport reduces the desire for personal transportation.

2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately and is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/16769  **Respondent:** 15650369 / Stephanie Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**POLICY E1 - Meeting employment needs**

I object to this policy for the following reasons.

1. I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

1. The site is in any event subject to frequent flooding and contains ancient woodland and is unsuitable for development.
1. **I object** to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3, an area which already sees severe congestion at both ends of the working day, often tripling journey times through the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/16770  **Respondent:** 15650369 / Stephanie Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E2 - Location for new employment floorspace**

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/16771  **Respondent:** 15650369 / Stephanie Dean  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E5 Rural Economy

I object to the loss of rural employment implicit in this draft plan. Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16772  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I object to this policy. The policy should acknowledge that much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly, the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example, the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attraction. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16773  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this policy on the grounds of its weak and ineffective wording.

- The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force and possibly deliberately vague. These principles should be explicit in the statement of policy.
- There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development in, for example the Walnut Tree Close /Woodbridge Meadows area, where very significant numbers of new homes could be provided, and in several of the existing surface car parks which are not included in the Plan. Such town centre sites could meet much of the housing need over the Plan period without harming the countryside.
- There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
- The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.
- The policy also fails to provide guidance on design requirements, as required by the NPPF.
- The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores, and ignores the trend towards increased on-line shopping from said chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers, making shopping in Guildford a unique rather than repetitive experience. Above all, the retail development proposals must not damage the viability and historic attractiveness of the High Street.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16763  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy H1 for the following reasons:

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the Plan period. It fails to set rules on important issues such as constraints and density and is not specific enough to provide a practical framework for planning decisions.
A much higher proportion of Surrey University students should be housed in university accommodation. The University has proved to be recalcitrant in providing accommodation in spite of outstanding Planning permissions. The policy does not do enough to rectify this.

I object to the increased numbers of Traveller pitches proposed. See my comment #9 in Policy S2 above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18580  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed increase in the number of Travellers’ pitches. The provision of additional Travellers’ pitches, often in the Green Belt, is a source of much local friction between the settled community and the “Travellers”. Especially where the Plan references limiting the occupancy of these pitches to a small number of specific families, does this not imply these will be permanent residences? Regardless of the nature of construction of their dwelling, if one family spends their entire life on one spot, can they be said to be “travelers” with a different set of rules to those of us who live in “permanently constructed” dwellings. I do not believe their lifestyle choice should be a matter for public provision of pitches, and there is no longer any requirement for journeymen in this modern economy. I am especially concerned at the detrimental impact of the Borough’s encouragement of this lifestyle on the Traveller children and their educational needs. The open-ended wording of the numbers to be permitted (at least 73 “or any new target as identified within an updated Traveller Accommodation Assessment”) is dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16764  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this policy on the grounds that it should be more firm and explicit on “unviability” in paragraph 4.2.40. The possibility of avoiding or reducing the affordable housing obligation through use of unviability arguments is likely to inflate land values and lead to appeals. In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

Guildford's popularity and location in the Green Belt, with the Surrey Hills, close to other towns and within the London Commuter belt mean that demand is virtually unlimited and no amount of affordable housing will meet it. As I understand it, “affordable” homes are defined as those with a value of 80% of the market value. In a high house-price area such as Guildford, that still may not be truly affordable to many. The real need is for social or “council” housing but that will not be provided by current developer-led models.

Paragraph 4.2.3 (in Policy H1) states that the SHMA has calculated that 70% of the affordable homes needed are 1 and 2 bedroom dwellings. In Guildford town centre there are at least 6 sites, covering around 2 hectares (5 acres), that are derelict or used as surface car parks, some for decades, yet the Council appears to have had no success in redeveloping these at all. They have the potential to be used as mixed use town centre projects which could include apartment accommodation of this size. Not all of them are even included in the current Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16765  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy for a number of reasons:

1. The wording of the policy is far too wide and ignores all other aspects of planning policy. As drafted the Planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

1. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. If the proposed housing would meet identified need and adjoins a settlement under this policy wording, permission would have to be granted even in the most sensitive AONB location, regardless of whether more suitable locations were available. The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.
1. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer-led proposals which will be difficult to resist.

1. The policy wording should define “small”, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the Plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

1. The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular, I believe adding the concept of “safe and easy walking distance” extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance and school children are expected to walk further than that before being eligible for free school travel.

1. The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. The supporting text includes this point, but it is not part of the policy itself and may carry little weight at appeal.

1. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included, and that developments should remain outside the open market in perpetuity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16776  Respondent: 15650369 / Stephanie Dean  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY II - Infrastructure and delivery

I object to this policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the Plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.
The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

With some 5,000 houses being proposed close to the villages of Ripley, Send and West Clandon, the roads serving the villages will become even more congested. Cycling has become an ever popular past time, particularly at weekends when hundreds of cyclists pass through the villages on their way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the villages and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury to the public. In the case of West Clandon, the Street often only has a narrow footpath on one (alternating) side of the road making it very dangerous, especially when vehicles mount the pavements as some have to do in places in order to pass.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this Plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the Plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local Plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This Plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic, with very little evident thought or planning as to how this is to be achieved, and how it will be funded. Implementation is critically dependent on providers outside the Council’s control and Community Infrastructure Levy income. Instead of recognizing this as a key constraint, the Plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as many local doctors’ surgeries will have their services stretched and overwhelmed. Many of these services are already at capacity with waiting times of 2 weeks to see a GP. Any further development without funding will place further stress upon existing health services. There is no provision for increasing the capacity of the Royal Surrey County Hospital, Guildford. Where is this to be assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are likely to be many years away, even if they ever happen, and are beyond the command of the Council. The draft Plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network.

Road infrastructure represents a major constraint that should have been applied to the OAN at a much earlier stage in the Plan process and not left as an unresolved difficulty in the draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16766  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

I object to this policy as I am concerned it weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan, which welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. The policy should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16767  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2 – Green Belt

I object to this policy for the following reasons:

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local Planning policy. The Green Belt is not the Council’s to give away and once it is gone, it is gone forever. Sacrificing areas of the Green Belt to a developer-influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. Green Belt was last taken in the 2003 Plan and now it is again proposed to move the boundaries.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the Plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

1. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study was a simplistic exercise based on the erroneous principle that ranking Green Belt land would identify candidates for development. The Council has not carried out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently Planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

1. I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt (a term which neither the Plan nor the NPPF defines) and there is no need to inset them. I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling, and that infilling is also proposed outside the settlement boundaries of a further 11. In effect, each village will become a nucleus for further development. The NPPF’s other four tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

1. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused intense opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” This is misleading. Since the Second World War, Guildford has been expanding to the north east, starting with the Bushy Hill estate in the 1950’s, then Merrow Park and Weybrook Park were built on around 100 hectares of Green Belt land in the 1980’s, and now 89 hectares of land from the adjacent Gosden Hill Farm is also to be taken out of the Green Belt. This will connect to the proposed Garlick’s Arch development (30 hectares), also in the Green Belt, via several slip roads and feeder roads alongside the six-lane A3 (a further 4.5 hectares). If allowed, these two proposals will more than double the area of Green Belt land hitherto removed to enlarge Guildford’s NE suburbs.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16768  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4 Flood risk and Water Source Protection Zones

I object to development in areas which are at risk of flooding (Policy P4). National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16761  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both Plan-making and decision-taking.” The policy calls for “development that secures the economic, social and environmental conditions in the area”.

As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead there is no definition of “sustainable development” and no principles for balancing economic growth, social justice and environmental protection in practice to local Planning decisions are given. However, apparently, all excursions into the Green Belt constitute “sustainable development”. Policy S1 fails to recognize that economic growth, social justice and environmental protection often conflict. It is clear that economic growth has trumped the other considerations in breach of the NPPF’s requirements.
Policy S1 is seriously deficient in omitting any mention of the Green Belt. It should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections as required by the NPPF. This would set one clear boundary to Planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve Planning applications “wherever possible” and “without delay” seems to fly in the face of the NPPF presumption in favour of sustainable development and becomes a presumption in favour of any development at all. It also seems at odds with public statements from the Leader of the Council to the effect that including a site in the Plan does not mean that permission will be given for development.

The policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to Policy S2 on a number of grounds:

1. Almost every element of the Plan is predicated on the OAN adopted as the housing number. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. The algorithm used to calculate this number has been declared commercially sensitive and has not been revealed. I believe this number to have been seriously overstated before the BREXIT referendum but it is utterly without foundation now.

1. The number is based on a Housing Market Area (HMA): “West Surrey” comprised of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. “West Surrey” is much too small. Half of Guildford Borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate, Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

1. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The Plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get Planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

1. The OAN/housing number of 13860 is not as fixed as it would appear. The number of homes proposed, plus existing Planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. There are references in the evidence base documents to the possible need to make up shortfalls in Woking’s provision and the
“Sustainability Assessment” carried out for the Council came up with a preferred figure of 15860 houses. It is unreasonable to embark on the most extensive transformation of the borough on the basis of an unclear housing target. The scale of the development proposed increases the onus for it to be seen to be sound.

1. The Plan in general and this policy in particular do not address the point that Guildford exists as part of London's commuter belt. In this area the demand for housing is, in practical terms, unlimited, and predominantly dependent on what is available. The increase in the supply of housing in Guildford will simply result in a shift of population into the area, where this population would otherwise be able to find other areas in which to live. “Affordability” is not a fixed sum but is dependent on market prices. “Affordable” housing in Guildford does not come at a price that most would consider “affordable” regardless of how much of it is built. The Plan will not reduce prices or increase affordability except at the margins. There is now recognition that in central London, where urban regeneration has transformed many districts and the term “inner city decay” is out-of-date, it is now the outer London suburbs that require regeneration. Over the period of the Local Plan, this process should be factored in to housing needs in areas such as Guildford, and could reduce the rate of outward movement from London.

1. This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by topographic and infrastructure limitations. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). I believe the Council is under a duty to properly consider applying these constraints and that this has not happened. This approach differs from the other boroughs in Surrey. The Plan is based on the assumption that “growth is good” but is this really the case? More consumption, more congestion, more Green Belt being taken - this is not a sustainable strategy.

1. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon, Ripley and Send in particular. The developments at Garlick’s Arch and Gosden Hill Farm will put severe strain on the road infrastructure in and around West Clandon which will be unable to cope. The proposed A3 slip roads at Burnt Common will make matters much worse. There will be a significant increase in traffic flows along the A247 through West Clandon, a stretch of road which is already of concern with regards to safety, funneling into several pinch points which are under 5 metres wide. Here, two lorries cannot pass without one mounting the pavement, along which young children are walking on their way to the village school. The edge of urban Guildford will be moved much closer to West Clandon. Guildford’s edge will be built on Green Belt land which was zoned to safeguard the countryside from encroachment and check the sprawl of large built up areas.

1. The Plan is out of balance in proposing 65% of housing on the Green Belt and 36% in the three wards of Lovelace, Send and Clandon and Horsley. These are rural areas whose identities will be greatly and detrimentally changed by these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1845  Respondent: 15650369 / Stephanie Dean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**I do not agree** that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

- The evidence base documents take no account of the radically changed environment and outlook following the BREXIT referendum. This is not the fault of the Council but nevertheless means the plan is not based on actuality and requires a re-evaluation of the strategic context.
- The Transport Assessment was published at the same time as the Plan leaving little time for study and analysis. The projections contained appear to be quite inadequate in that 1) they average congestion over 3-hour time bands, which materially reducing the impact of congestion and 2) they do not model junctions.
- The “Assessment” shows that congestion will worsen significantly over the period of the Plan even if all the proposed and aspirational infrastructure is built, surely this cannot be seen to be acceptable.
- The Strategic Housing Market Need (SHMA) attempts to justify an Objective Assessed Need (OAN) based on a very aggressive desire for economic growth in the borough. No case is made that such growth is sustainable. The assumptions and estimates are opaque and have not been adequately scrutinized by Councillors. Consequently people have to take on trust the work of a consultant. In any case, political events have overtaken the SHMA.
- The number and complexity of the documents in the evidence base make reading, understanding, analysis and assimilation extremely difficult.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I do not agree that the Plan is sound for the following reasons:

- "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
- The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
- The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB’s and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
- The draft Plan does not accord with the National Planning Policy Framework (NPPF) policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB’s and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified, together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.

- Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the BREXIT referendum.
- The housing number is at least double the achieved rate of building in the Borough over the last several years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
- Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag behind development and lead to much higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
- The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1848  Respondent: 15650369 / Stephanie Dean  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There is no evidence on which to base a decision. This is a matter for an independent assessor to judge in possession of a fuller picture than has been revealed hitherto.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1849  Respondent: 15650561 / Ellie Wilson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4044  Respondent: 15650625 / Andrew P Donnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my OBJECTION to the proposed Guildford Local Plan 2016. This needs to be rethought with regard for local people opinions and concerns, the people who live locally and not enforced by people who do not understand the local dynamics and situation.

I have a number of concerns to this ill thought out plan.

Extension of Horsley Village Boundary - There has been no case made for this at all and should not be allowed. It seems to me that this is purely to create more land for developers and cannot be right.

Removing The Horsleys from the Greenbelt - There is no exceptional case for removing The Horsleys from the Greenbelt. This is not proven at all and goes against all Government planning guidelines. Therefore this cannot happen. Horsley is a small village steeped in history and cannot take the proposed number of houses. .
Infrastructure Overload - If local councillors and planners took the time to come out of their ivory towers to see village life they would see that Horsley is at breaking point, roads are very busy (and poorly maintained). The drainage is a disgrace with constant flooding. All facilities are oversubscribed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7531  Respondent: 15650625 / Andrew P Donnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ockham Airfield - This has already been declined so why is it included again. This s planned is a stupid idea and driven purely by financial gain with no consideration for local concerns, environment, traffic and bio diversity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2533  Respondent: 15650625 / Andrew P Donnell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing once again to state my objection to the revised local plan that has been prepared.

It is clear that you have not taken into account the views of 1000’s of local residents and qualified people on the environmental impacts of the proposed plans.

There is still too much development into green belt, which must be protected and a distinct lack of thought of the required infrastructure to support any of this building.

The proposed development at Wisley which has already been rejected but is still in the plan is ridiculous in terms of size. The roads cannot take this, it will be like central London and the A3 is one of the busiest junctions, with regular accidents and this will only increase.

Clearly we need to increase housing stock but this has to be proportionate to the local surroundings, infrastructure and existing stock. This plan is clearly not and needs to be reconsidered AGAIN.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4046</th>
<th>Respondent: 15651009 / Miranda Pigram</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the building on the Green Belt around Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill, because there are no special circumstances for justifying these developments and the fact that Green Belt is meant to be permanent and not continually eroded.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7532</th>
<th>Respondent: 15651009 / Miranda Pigram</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the development at Garlick’s Arch for 400 houses because the plan was sprung on the village without any prior consultation and only 2 weeks’ notice. The development is not required in terms of housing need either for the village or the borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the proposed industrial development of 7,000 m² at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 m² of industrial space it should be at Slyfield where there is a 40 ha site available.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<p>| Comment ID: PSLPS16/7533 | Respondent: 15651009 / Miranda Pigram | Agent: |</p>
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25 from and to the Woking area, there would also be additional traffic through Clandon. This would make the interchange a disaster for Send and Clandon.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4047  Respondent: 15652033 / James Scrace  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to the lack of immediate provision for supporting infrastructure mentioned in the Local plan such as schools or doctors Surgeries considering the considerable increase in residents the mass development sites will create.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4048  Respondent: 15652033 / James Scrace  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
I object to the lack of any supporting evidence for the alleged housing demand numbers, which are used as justification for building on the precious Greenbelt sites, sites which make the borough the desirable place many love to live and work in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7534  Respondent: 15652033 / James Scrace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have been a resident to Send Marsh for over 20 years and I am writing to object to the latest change made by Guildford Borough Council concerning the Draft Local plan for Send, in particular the designation of the Garlicks Arch site.

This objection is on grounds that not only is this site unsuitable for a number of reasons of which I will elaborate throughout the course of this email, but that the manner in which this last minute amendment to the local plan has been executed, which I do not believe has been carried out in a fair and transparent manner; considering the time-frame, the extent of the amendment and finally the lack of consultation with residents, Parish council and the necessary regulatory bodies concerned with proposed development.

Firstly I would like to bring your attention to the application 16/P/00783 on Oldlands Field Yard, a small area of the recently earmarked site for mass development on the Garlick's Arch site, of which there is a proposal for 9, two storey dwellings that was filed almost exactly a month (12th April) prior to this latest last minute amendment to the local draft plan on 11th May. This appears to be too much of a coincidence and exemplifies the seeming lack of transparency and stealth tactics employed by Guildford Borough Council and developers in seeking approval to develop part of the site in question, which would provide a 'foot in the door development' and platform to further develop the wider site and strengthen the case for the inclusion of the Garlick's Arch site within the draft local plan. Furthermore, there is evidence to support this possibly cynical view in the possibly over-comprehensive extent of accompanying reports to the 9 dwelling development, and the transport modelling being undertaken by Surrey County Council and Highways England, which would reveal that GBC have known about the change in site designation for the local plan and benefits afforded by the initial 9 dwelling development for some time. There has however been a lack of publicity and public consultation for both these cases, and the change in site designation in the amendment comes 8 working days prior to the full council meeting - surely unacceptable in view of the above and considering the extent of the change and impact of an additional 300 dwellings on both the villages of Send and Ripley. If not mandatory, surely there is a duty of care to notify the residents of these areas affected for even the site being included provisionally, despite the 6 week allotted public consultation period after the decision reached on 24th May.

If we are to evaluate the previously executed studies by GBC with regards to the Greenbelt strategy, and the Mass development and Village expansion evaluation - this change in site designation to Garlick's Arch seems to be contradictory. The site in question is deemed to be medium sensitivity in terms of Greenbelt yet it is being considered for mass development when there are not only low sensitivity areas available in close proximity but a list of brownfield sites - arguably in more strategic locations with regards to the industrial designation of the site, available for re-use in for example, Slyfield, as per the 'previously developed site' report also published by GBC. In the mass development study and village expansion survey it evaluates that Ripley is unsuitable - how then can a development site of this scale be promoted in the local plan that will implicate Ripley for the very reasons that deemed it unsuitable? These sites cannot be treated in isolation, and this site at Garlick's Arch straddles both parish council zones and will have wide-ranging implications for the residents and well-being of not only Ripley and Send, but also Clandon.
With regard to the 'exceptional circumstances' required by borough council to justify removing Greenbelt for development, as stated in the National Planning Policy Framework - on what basis are the reasons given (as per the local plan amendment, of meeting the needs of housing stock) when this housing need is not proven? It is forecast that the population of the Guildford borough is actually set to plateau and decrease (and any statistics contrary to this are surely inflated by the false counting of university students who do not reside past their degree period), so surely therefore no need to increase the 13,860 houses already proposed for the borough by 300 in this development, and certainly no local need in Send to expand the Village by 25%.

This view is further reinforced in terms of the employment floor space designated for the development of 7000 sqm since the ELNA shows a reduction of 80% required from the previous draft plan. Surely from a strategic perspective the site at Syfield is more suited for this type of development, should 7000 sqm still be deemed necessary. One of the reasons for the preservation of Greenbelt is preventing Urban sprawl and preventing the merging of towns and settlements - the site at Garlick's Arch, once fully developed would represent the single largest development in the area, not only in isolation but also if coupled by the Send Marsh Road/ Linden Way housing estate positioned opposite, only separated by the Portsmouth Road. Surely there is no justification for development for Garlick's Arch purely on the basis of the site location opposite an already large housing development as this would go against reducing sprawl and the merging of settlements, and of course the lack of accompanying local amenities - all of which, at present, are out of walking distance.

The implications on-site are also elements of the development proposal for Garlick's Arch which seem to have been overlooked, despite having been identified through both the Mass development and Village expansion analysis carried out by GBC. The site is not only Greenbelt land but also has 4.6 hectares of permanently protected ancient woodland which requires Forestry commission consultation and approval for any development in close proximity to in the first instance. Has the council considered this or given any thought to the implications the removal or damage to this woodland will have on not only the UK's ancient woodland stock but to the damage to local biodiversity and habitats of wildlife? Other site implications identified in the report are the risk of flooding due to the high spatial priority flood plane which cuts across the site from SE to NW. Surely then GBC cannot agree to develop the site on moral and practical grounds due to this known risk but also from the point of providing housing offer that lacks quality considering its close proximity to the A3 of which this development and accompanying junction alone will increase the traffic-based noise which will impact the quality of life for those resident.

The impact of this site on congestion and road traffic is another element which seems to have been overlooked by GBC. Whilst there is assessed benefits by GBC in the 11th May amendment of an additional junction onto the A3, surely this is short-sighted considering the resulting increased congestion on not only the A3 from this but also on the surrounding local roads of which, during traffic gridlocks, will be used by road users to avoid the A3. In addition, as identified by GBC in a congestion and traffic strategy report published in 2014, the Wisley A3/M25 interchange is already a bottle-neck for traffic congestion. Needless to say, an increase in motorists from not only the development at Burpham of 2000 new homes but also Wisley of 2000 homes, plus of at least 400 from not only in the area as a result of the Garlick's Arch development who may join at Ripley, but also of those joining the A3 one junction prior to this bottleneck from neighbouring Send, Clandon and Woking. It should also be highlighted that the increase in industrial based motor transit from the industrial designation of the site, will almost certainly exacerbate this identified bottle-neck.

At a micro scale, The Portsmouth Road adjacent to the site and in particular the junction with Send Marsh road of which this new development is within 350 yards of, already experiences a high level of congestion and traffic red zone during peak times. This development will not only exacerbate this issue through the increase in a potential average of 400 extra cars resident to the site, but also visitors to the site, and the increased volume of those turning in and out of the site will create further traffic flow disruption to the Portsmouth Road. The Send Marsh Road junction in question has also been the site of many traffic accidents in the past few years and the development of this site will further increase the risk of future road incidents. A counter argument which may be raised by GBC to an increase in car congestion resulting from this site - taking into account the proximity to bus stops and train stations, is surely invalid considering the infrequency of the buses that service this area (hourly or two hourly respectively) and the distance and time taken to walk to the nearest Train station at Clandon - a 1.7 mile journey which would take approx 30 min walk when 20 min walking journey is recommended to local hubs which provide transport linkages to nearest urban centre. Notwithstanding this, the conditions for walking to this station are unsuitable considering the quality of the pavement service, the termination of the pavement at various points along the Clandon road, and the lack of adequate street lighting to enable a commuter to comfortably and safely get there and back on foot.
The scale of the change as a result of the change in site designation is also something that requires scrutiny - nowhere in the amendment issued on the 11th May does it justify why firstly a net increase of 300 dwellings is required, in light of the previously agreed designation in the previous addition of the local plan of circa 100 dwellings, or responsive to any statistics; considering that there have been past assurances from councillors stating that this very situation would not re-emerge, or provides insight into how this will be supported locally or assesses the impacts on the local infrastructure and amenities. Has the council given any thought to how the local doctors surgery or shops in both Send and Ripley will cope with at least 400 additional households to support?

If we are to further assess the potential impact of this mass development in terms of education provision, it is already well known and publicised that this area of Surrey is well oversubscribed. The increase in 400 dwellings will not just place further strain on this system but will be untenable considering that during the period 2014/15, not only the schools within catchment area of this site but within a circa 15-20 mile radius, currently experience an average ratio of 2 applicants per place for both primary and secondary education. Any increase in student yield therefore, despite the ratio of students per household forecasted in the accompanying education infrastructure statement, will place further strain on the education provision, and with no known strategy publicised which identifies this problem or an accompanying local school development or expansion program in relation to this site, something will have to give and one could suggest at least in the short term that this will be the quality of education offer available.

These are pertinent points which require careful thought in relation to the sustainability of the Guildford Borough as a place for quality of life offer in the long term, in particular the areas of Ripley and Send. Mass development proposals in unsuitable locations and on unnecessary scales such as this cannot be justified when this places the very reason people want to live in this area and wider borough, at risk.

To summarise:

I object to the site designation at Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7535  Respondent: 15652033 / James Scrace  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the A3 on off ramp at Clandon - this will create more congestion and traffic incidents, not solve them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16784  Respondent: 15652033 / James Scrace  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
I object to all erosion of the Green Belt and the weak justification considering the amount of previously developed brownfield site in arguably more strategic and suitable areas to meet any "housing demand".

I object to the disproportionate amount of development in one area of the borough e.g. Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1850  Respondent: 15652033 / James Scrace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the last minute inclusion of new sites with less than 2 weeks notice prior to the agreement of the inclusion at full council meeting, the limited consultation period - especially considering the severity of the last minute change, and the lack of transparency on the part of the council with regard to the aforementioned "foot in the door developments" on greenfield sites earmarked for mass development in the last minute amendment i.e. Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4050  Respondent: 15652257 / Marilyn Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I should like to register my objection to the Proposed Submission Local Plan. It is of great concern to me that you are proposing to provide such high density housing developments within the Horsley boundaries.

Since moving into West Horsley in 1989 there have been numerous times when the roads and drainage system have not been able to cope with the rainfall, which on some occasions does not have to be severe to cause flooding problems. The proposal to build many more homes in West Horsley will make this problem much worse.

There is also the problem of traffic causing more disruption as well as lack of parking spaces in the shopping areas.

There is a need to provide the supporting infrastructure first before even considering additional housing developments which are being proposed. The medical centre will not be able to cope without expansion, the number of school places would not be sufficient without another school being built, the provision of a more frequent bus service must be addressed especially to cover Saturdays as well as weekdays, the train station car park is already full during weekdays and the local roads network would need to be carefully considered to avoid severe congestion.

The redevelopment at the Thatchers Hotel site is very shortsighted bearing in mind that a prestigious opera company is setting up home in West Horsley. The need for a hotel is bound to be required and Thatchers Hotel is ideally situated.

I am opposed to the removal of the Horsleys from the Green Belt as the atmosphere of the villages will be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am not convinced that the development of this land is of benefit for the people of Guildford. The people of Guildford and visitors will lose the use of the land (originally given to the people of Guildford and placed under the Cathedral’s stewardship), our views will be adversely affected, traffic will increase significantly in an already busy area and local infrastructure (eg schools already oversubscribed, drainage and roads) will require additional investment.

Thank you for the opportunity to comment on this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16785  Respondent: 15652513 / Jordan Heasman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing because I OBJECT to any REMOVAL OF VILLAGES FROM THE GREEN BELT.

I hope all the emails you will inevitably receive will do something to make you take notice of the negative public opinion of your development plans in this green belt area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16786  Respondent: 15652513 / Jordan Heasman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I ALSO OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16787  Respondent: 15652513 / Jordan Heasman  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I ALSO OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/16788  Respondent: 15652513 / Jordan Heasman  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I ALSO OBJECT TO THE DISPROPORTIONATE AMOUNT OF DEVELOPMENT IN ONE AREA OF THE BOROUGH.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4051  Respondent: 15652833 / Don Babington  Agent:

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/4052  **Respondent:** 15652833 / Don Babington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7539  **Respondent:** 15652833 / Don Babington  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.
No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43).

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16794  Respondent: 15652833 / Don Babington  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Villages being absorbed by Guildford – not what the householders moved to the area for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16803  Respondent: 15652833 / Don Babington  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16800  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16801  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16802</th>
<th>Respondent: 15652833 / Don Babington</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16809</th>
<th>Respondent: 15652833 / Don Babington</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16807  Respondent: 15652833 / Don Babington  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16808  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

I object This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16804  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

In particular we object to villages being removed from the green belt, and the increase in traffic congestion that would occur. The A247 has at many places got narrow footpaths on one side of the road, making it extremely dangerous when traffic mounts the pavements – as often happens with lorries passing through.

We are also concerned about the following:-

- A247 would be more used more by the Sat. Nav.
- Environment: Health hazard – air pollution - Noise and the affect that has on nerves - Loss of green fields. People need to see greenery.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16806  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16795  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The natural habitat of wild life being substantially

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16798  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16799  Respondent: 15652833 / Don Babington  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO the late inclusion of site A43 Garlicks Arch. This has been slipped in at the very last moment without proper consultation. The added 400 houses will cause overcrowding of our schools and doctors surgery. Our Villages Medical Centre is already over subscribed and difficult to get doctors appointments. Another 800 minimum people would completely swamp this facility. The 7000 sq mtrs of industrial area would also increase the amount of Commercial Vehicles in the area using the local roads. We hardly need industrial buildings, as past developments have stood empty for years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7570  Respondent: 15653505 / Dave Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A43A the on and off ramp at Clandon/Burnt Common. This will cause complete chaos in the area, as all roads leading to the junction are country roads leading from Clandon, Ripley and Send. At present it only takes an incident at Wisley /Junction 10 of the M25 and our villages are swamped with traffic. This junction will make the whole situation worse as the local roads are so narrow and are unable to be widened to suit increased traffic flow. The Send Road only leads to similar narrow roads in Old Woking and Hoebridge areas, which are also unable to be widened.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7572  Respondent: 15653505 / Dave Robins  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A45 The Talbot. This is overdevelopment in a conservation area. Overdevelopment in Ripley will completely spoil the feel of a village which will then be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7571  Respondent: 15653505 / Dave Robins  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
</tr>
</tbody>
</table>

1 OBJECT TO site A57 The Paddocks – 4 Traveller Pitches.[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16823  Respondent: 15653505 / Dave Robins  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
</tr>
</tbody>
</table>

1 OBJECT TO all erosion of the Green Belt. Once we use this for building it will be lost forever. There are plenty of Brown Field sites to be built on first before using the Green Belt. The Green Belt is a buffer between Woking and Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16825  Respondent: 15653505 / Dave Robins  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
</tr>
</tbody>
</table>
I OBJECT TO any “in-setting” (i.e. removal) of any villages from the GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16824</th>
<th>Respondent: 15653505 / Dave Robins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO the Local Plan as the development proposed is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16826</th>
<th>Respondent: 15653505 / Dave Robins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT TO the disproportionate amount of development on the A3 between Burpham and the M25 at Wisley. With 2000 houses at Wisley Airfield, 2200 homes at Gosden Hill Farm and 400 houses at Garlick’s Farm Send. This will make an urban sprawl in this part of Surrey and will completely change the environment for all the residents and who live here as well as increased air pollution from all the additional vehicles. There is a lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1853</th>
<th>Respondent: 15653505 / Dave Robins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the last minute inclusion of new sites in the Local Plan with not enough time for a proper consultation period

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/4080</th>
<th>Respondent:</th>
<th>15653537 / Barrie Morse</th>
<th>Agent:</th>
</tr>
</thead>
</table>

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express my strongest possible OBJECTION to the New Local Plan.

The previous Draft Local Plan issued in 2014 for consultation received some 20,000 comments of which the majority expressed fundamental objections. The new local plan has made no changes. The New Local Plan does not respond to the concerns of electors and the 20,000 comments which will not be available to the inspector. I consider These issues amount to CONTEMPT of the electorate by Guildford Borough Council.

I am aware that both East and West Parish Councils made objections to the new Plan specifically to the former Wisley airfield on 4 July 2016. The Parish Councils have articulated this clearly. Guildford Borough Council must give full weight to the concerns they have so professionally expressed.

I have the following specific OBJECTIONS to the New Local Plan:

1. 1 OBJECT to the proposal to remove East and West Horsley from the Green Belt. The exceptional circumstances needed to justify such a fundamental and adverse change for the Horsleys have not been demonstrated and only Guildford Borough Council's perceived unfulfilled housing needs appear to support the proposal.

2. 1 OBJECT to the proposal to extend the boundaries of the Settlement areas within East and West Horsley. No sound reasons have been given for the proposed changes which seem to be aimed solely at increasing the land available within the settlements for future additional development.

3. 1 OBJECT to the proposal to designate Station Parade as a 'District Centre'. I see no reason to change this view. The proposed reclassification results from a complete misunderstanding of the nature of the facilities in the village centre and would inappropriately target the area for future urban developments.

The proposals made in the New Local Plan result in 593 new houses in the Horsleys within five years of the Plan being adopted without taking account of the 2,000 houses proposed at Wisley, 2,000 houses and mixed use development at Burpham, and 400 houses and commercial development at Burnt Common and Gosden Hill Farm. In West Horsley
alone, the proposal is to increase the housing stock by up to 35%! Once again, it is difficult to avoid the impression that this plan is the result of a desktop exercise prepared by individuals who have little knowledge of, or interest in, our villages. Adjustments to population growth projections made by Guildford Borough Council result in a population increase which is almost 70% higher than official national estimates for the Borough. The adverse impact on an overloaded existing infrastructure in terms of local schools, medical facilities, and road and rail transport would be substantial. The impact of the resulting urbanisation of our villages adjoining the Surrey Hills area of Outstanding Natural Beauty would be devastating.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7574  Respondent: 15653537 / Barrie Morse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT in the strongest possible terms to the proposal to develop a 2,000 house village at the former Wisley airfield, a site that forms part of the Metropolitan Green Belt and a 'first line of defense' against urbanisation from the A3 and M25. Guildford Borough Council's Planning Officer, in rejecting a previous planning application from the developer said 'it has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and other harm identified'. The proposal would be disastrous not only for East and West Horsley but especially for the local villages of Ockham, Hatchford and Downside. Anyone with local knowledge of the area will appreciate the strain such a proposal would place on local transport and infrastructure. Why does Guildford Borough Council continue to include this site in its plans in the face of massive objections from residents from across the area? I consider this proposal to be an act of ENVIRONMENTAL VANDALISM.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7642  Respondent: 15653537 / Barrie Morse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object in the strongest possible terms to the proposal to develop a 2,000 house village at the former Wisley airfield, a site that forms part of the Metropolitan Green Belt and a ‘first line of defense’ against urbanisation from the A3 and M25. Guildford Borough Council's Planning Officer, in rejecting a previous planning application from the developer said ‘it has not been demonstrated that the benefits of the proposal amount to very special circumstances such as to clearly outweigh the harm to the Green Belt and other harm identified’. The proposal would be disastrous not only for East and West Horsley but especially for the local villages of Ockham, Hatchford and Downside. Anyone with local knowledge of the area will appreciate the strain such a proposal would place on local transport and infrastructure. Why does Guildford Borough Council continue to include this site in its plans in the face of massive objections from residents from across the area? I consider this proposal to be an act of Environmental Vandalism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4069  Respondent: 15657057 / Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Regulation 19 Draft Guildford Borough Council Local Plan 2016

I object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent. The current SHMA inflates the proposed housing figure due to the following factors:

- the failure to correct for errors in the historical data for international migration flows;
- the way it inflates the requirements of students; and
- the flaws in the method for estimating the number of homes needed to support job growth.

The Green Belt and Countryside Study does not look strategically at options for development in major settlements beyond. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Exceptional circumstances do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation. It is apparent that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads and pinch points. Evidence on bus travel is compromised because no clear location for a bus interchange is proposed. No information has been provided on the demand for and capacity of rail services, and the main line to London is already extremely busy in peak periods.

Information about the town centre as regards traffic, buses and parking is lacking. The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained. The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included.
The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

Key parts of the evidence are missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan.

The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. It would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 13,860 new homes by 2033. It would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to government policy to develop on the scale currently proposed. I am concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.” Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.
GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

GREEN BELT SITES

For the reasons stated above, I object to ALL Green Belt sites allocated for development in the local plan.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7602  Respondent: 15657057 / Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A25 GOSDEN HILL

I object to policy A25 Gosden Hill

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7603</th>
<th>Respondent: 15657057 / Frances Turner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Coopurate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A26 Blackwell Farm. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

- Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

- Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

- Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7604</th>
<th>Respondent:</th>
<th>15657057 / Frances Turner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A35 WISLEY

I object to Policy A35 Wisley. I object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. However, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.
- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
• Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).19

• Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7605</th>
<th>Respondent: 15657057 / Frances Turner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A42 CLOCKBARN NURSERY

I object to policy A42 Clockbarn Nursery. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area. The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical. Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic. Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7606</th>
<th>Respondent: 15657057 / Frances Turner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A43 GARLICKS ARCH

I object to policy A43 Garlick’s Arch. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. There is a danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

I object to the proposal to build 7,000 sq m of light industrial, general industrial or warehousing on the site at Garlick’s Arch. There is no need to place a Strategic Employment Site in this location when there is plenty of spare space available at Slyfield (40 ha). The Employment Land Needs Assessment (ELNA) 2015 has been reduced by 80% since the ELNA 2013. There is no longer any need to place industrial development in the Green Belt when there are plenty of brownfield sites available.

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
I object to the lack of proper infrastructure planning for sites (Policy 11) which requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I object on the grounds of the congestion that development will cause to the trunk roads, A3/M25 (Policy 12). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7607</th>
<th>Respondent: 15657057 / Frances Turner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43a BURNT COMMON

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

I object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/7609  Respondent: 15657057 / Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

POLICY A44 SEND HILL

I object to policy A44 Send Hill

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring. The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development.

A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties.

The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons.

On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. I therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials.

GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge and development of this site would be a health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1 MAKING BETTER PLACES

I object to Policy D1 Making better places. I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas where Government policy requires development to preserve or enhance their character. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design rather than result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16883  Respondent: 15657057 / Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 HISTORIC ENVIRONMENT

I object to policy D3 Historic Environment. This policy clashes with the strongly pro- development agenda of the rest of the plan. The policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. Any development close to historical assets which is harmful should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16880  Respondent: 15657057 / Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E7 TOWN CENTRE

I object to Policy E7 Guildford Town Centre. I am of the opinion that policy E7 is ill-informed and there is insufficient evidential support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs.

There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 45,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

The failure of the North Street scheme to be redeveloped over the last ten years is a testament to lack of demand which has been so poor that the original planning permission for a large retail scheme became time expired.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16879  Respondent: 15657057 / Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2 GREEN BELT

I object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” This is completely false. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and it needs to be permanently protected. The boundaries of the Green Belt through Guildford Borough were defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special
character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.

I object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages reflect the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development. I believe this policy is based on a flawed Green Belt and Countryside Study.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions. Send is a good example of villages that should not be removed from the Green Belt. Send provides an important Green Belt buffer between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

I object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt around Send which include:

- The land behind the schools including playing fields and woodland.
- The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
- Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16877</th>
<th>Respondent:</th>
<th>15657057 / Frances Turner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
POLICY S1 SUSTAINABLE DEVELOPMENT

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16878  Respondent: 15657057 / Frances Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 PLANNING FOR THE BOROUGH

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

I am surprised that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing.

The figure of 13,860 new homes is unsubstantiated. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the NPPF and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. The NPPF also makes clear that, once established, Green Belt boundaries should only be altered in “exceptional circumstances”, through the preparation or review of the Local Plan. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case
law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/1851  **Respondent:** 15657057 / Frances Turner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy A42 Clockbarn Nursery, Tannery Lane**

The proposed allocation for 45 homes in the previous draft plan on green belt land was objected to & I object again to this revision which now proposes a 33% increase to 60 homes. Tannery Lane is unsuitable for the quantity of traffic which would be generated, as is the junction with the A247, and there are no exceptional circumstances to warrant development on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/1853  **Respondent:** 15657057 / Frances Turner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy A43 Garlick's Arch, Send Marsh**

I object to the proposed allocation for 400 homes and 6 travelling show people plots. There are no exceptional circumstances to warrant development on the green belt. There is insufficient services infrastructure for housing and show people plots, nor any justification for concentrating 6 of the proposed 8 borough-wide show people plots within Send. The road network is insufficient for housing development on this scale and for extra large vehicles associated with show people's livelihood.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1854  Respondent: 15657057 / Frances Turner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58 land at Burnt Common, London Rd

I object to a new allocation of 7,000 sq m of industrial or warehousing which was deleted from the 2015 draft. I also object to the wording of the allocation: the 2016 "maximum" allocation of 7,000 sq m has now been changed to "minimum". There is a surplus of industrial premises in the borough and the requirement for further industrial/warehousing has not been proven. The road infrastructure is inadequate and there are no exceptional circumstances to warrant development on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/566  Respondent: 15657057 / Frances Turner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 2 paragraph 4.3.15 green belt.

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is an historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/4070  Respondent: 15657121 / Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7612  Respondent: 15657121 / Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A25 Gosden Hill Farm which is a massive over development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7613  Respondent: 15657121 / Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A35 Wisley Airfield again 2000 homes that are totally inappropriate and unsustainable development in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7608  Respondent: 15657121 / Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the late inclusion of site A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7610  Respondent: 15657121 / Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43a the on and off ramp at Burnt Common/Clandon as this will increase traffic problems in the villages, NOT help them!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7611  Respondent: 15657121 / Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 The Talbot as this is over development in a conservation area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7614</th>
<th>Respondent: 15657121 / Robert Wheeler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to site A57 The Paddocks - 4 travellers pitches</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16887</th>
<th>Respondent: 15657121 / Robert Wheeler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Where does this need come from to destroy a villages local identity? Because that's exactly what is going to happen [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]. Same as by allowing 'travellers' access to camp out on the fringes of the village. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] Within walking distance of a school. Within touching distance of a field that is not only used by the school for Sports Days but is also used by the village for local events which create a positive buzz and an opportunity for the village to fund raise.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16888</th>
<th>Respondent: 15657121 / Robert Wheeler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
There is no credible infrastructure for the plans you have set forth. The local surgeries are already at breaking point with the amount of people that use there dwindling services, there is no way that the roads can take the increase in traffic that this development will create. The A3 and M25 will turn into car parks on a daily basis, while the local roads of the villages will come to a continuous stand still. Two thousand homes means more families living in the area. We don't have the schools to take in their children. You will take a green community and turn it into a smog filled hell hole which will sit on the door steps of Guildford. You are creating an abhorrent abomination that will not solve or remedy any current or underlying issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16886</th>
<th>Respondent: 15657121 / Robert Wheeler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What is so baffling, is that you come with up with these silly ideas like "oh we'll just put 2000 homes here" but don't think about the ramifications of how that will affect the local area. There are already too many cars on the roads around Ripley, Send, Send Marsh, Burnt Common, Horsley, Clandon that during peak times the slightest accident can cause a mile tail back and bring a village to a stand still. The volume of traffic on the roads everyday increase the wear and tear on the roads which lead to potholes and unsafe driving conditions. Two thousand homes, just think about the stupid amount of traffic that that will increase, think about the excess petrol fumes and what effect that will have on the seldom areas of greenery that you choose to leave standing. This ridiculous idea of turning Burnt Common into Slyfield Greens [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature], and what's the thinking behind Garlick's Arch? That all residence who live on that development will come and go only via the A3? Because there's no way that Portsmouth Road is going to manage with that added level of traffic EVERY DAY. So now you have an abundance of traffic joining the A3. All this will do is turn the A3 into a car park and I know what your answer will be for that. "We'll just make it four lanes each side", after all what's a few less trees and Wisley right?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16884</th>
<th>Respondent: 15657121 / Robert Wheeler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to any "in-setting" (i.e. removal) of any villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16882  Respondent: 15657121 / Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Quite simply put I object to the local plan as the development proposed is not sustainable (Policy S1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16885  Respondent: 15657121 / Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1858  Respondent: 15657121 / Robert Wheeler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing in regard to your scandalous plans to uproot and destroy the place that I have called home for 38 years. The changes to the local community should your plans take effect will quite simply be catastrophic for every resident who presently resides within the local area. It is true that real estate in Surrey seems to come at a premium these days, but that's because its a nice place to live and is in a commutable distance of London. But the answer to the housing crisis is not to dig up the countryside and spoil the local area. The answer in my opinion is to encourage business to move from the South-East to other areas of the country where communities are crying out for commerce. Frankly the proposed changes lead me to wonder who exactly elected you lot to take office in the first place given that every one of the following points is so remotely dumbfounding its almost comical we are forced to write in and share our dissatisfaction with what you intend to create.

I mentioned how comical this whole plan is earlier. In many ways its like "the Goonies" revisited. We have the evil developers (that would be you lot), we have our group of Goonies (that would be everyone writing in objection to these plans) all were lacking is a Pirate Ship and a hit track by Cyndi Lauper. I just hope that like those fictional characters in that classic 80's movie our spirited rebuttal to your plans is good enough to see off the impending calamity that your so called local plan will impose.

In short your local draft plan is A VERY BAD IDEA. Hopefully this message will give you the clarity to wake up and do the right thing. LISTEN to your local community, common sense would suggest that we can't all be wrong.

I request that my comments are shown to the planning inspector and would appreciate confirmation that this communication has been received.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I am writing with regard to the proposed Draft Local Plan Strategies and sites June 2016.

I have many concerns regarding this new plan the most unacceptable aspect of the proposal is the proposed increase in housing for West Horsley. The proposed 35% increase in 6 years is clearly ludicrous. No plans for local infrastructure have been shown. The roads are already overcrowded and the drainage systems are at bursting point. The village designation as a Rural District centre is also inappropriate. The proposed increase in housing will make the local amenities un useable due to the fact that I already struggle as disabled drivers to park. I also struggle to receive doctors appointments as the surgery is oversubscribed.

The parish council offered a sensible proposal i.e. a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home. This would enable the current community spirit and ethos to remain and allow the village to thrive as a part of proper rural England. This would then respect the NPPF policy which requires that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.
I note also that the designated green belt land which I have always been assured would remain as such, has now become prime building land. I understood in 2014 that it is possible, under exceptional circumstances to change green belt land to enable development. I now understand that this will be obtained by “Insetting”

Can the council demonstrate that all of the required process has been adhered to and recorded and that these circumstances legally allow such re-designation.

Can the council also confirm that all possible brown-field sites have been prioritised for development prior to the green-field being used?

With regard to the proposed development at Manor Farm. I am extremely concerned about the extra road traffic this proposed development of some 135 homes would produce. New residents needing to use the A3 to Guildford or London will chose the shortest route to the main road. This will create traffic down the narrow Long Reach road, which includes a very sharp blind bend towards its North most end. This could easily result in a future accident.

I live in Northcote Crescent and already have problems with our garden flooding during periods of high rainfall. The Manor Farm development lies on land higher than where I am. The large area of impermeable land that will be created by the development will without doubt contribute to this problem.

With regard to the surface water run off from this development at present this runs into a pond at the back of the proposed Waterloo farm proposed development. The area of land around Ockham Road North in this area is already a high risk flood area. These two proposed developments will also add to this problem unless a very major surface water alleviation project is to be undertaken. I look forward to seeing the promised hydraulic modelling which is only the start of design development work. The feasibility of this flood alleviation work, together with a design and budget costs should be investigated prior to consideration for actual residential development. Normal SUDS schemes will not be sufficient to alleviate this problem which needs to be sorted now let alone following extra new development.

In summary our concerns are as follows:

- Inadequate flood prevention planning for Nothcote Crescent and Ockham Road North.
- Inadequate road access for long reach to A3 links.
- Inadequate facilities at station parade shops and surgery.
- Inadequate school facilities in area.
- Inadequate consideration for the use of brown field sites.
- Inadequate exceptional circumstances to change green belt land to enable development.
- Inadequate consideration for population growth prediction figures.
- The complete lack of consideration for the National Planning Framework requirements

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Sites

It is noted that there are 57 proposed site allocations in the plan for a range of uses, including for housing, employment, retail and traveller pitches. The housing/mixed use sites provide for a wide range of dwellings from 10 units up to 2000 units. Most of these sites are some distance from Waverley but one (A29), which would deliver around 1,200 homes in the Tongham and Ash Green area, contains two parcels around Grange Farm that are close to the junction of the A31 and the A331 and also close to boundary with Waverley. One of these parcels is subject to a current hybrid planning application for 254 dwellings and associated SANG with the housing in Guildford and the SANG in Waverley. It would be important for any impacts from this allocation, including impacts on the Thames Basin Heaths SPA to be addressed in this or any subsequent planning application.

In addition, there are several large strategic sites of between 1,000 and 2,000 dwellings that are close to the Guildford urban area and are near to the A3 trunk road. These include sites A24 (Siyfield Area), A25 (Gosden Hill Farm), A26 (Blackwell Farm) and A35 (former Wisley airfield). It will be important to ensure that the impacts of these developments on the A3 are carefully assessed in conjunction with planned improvements to the A3, for example the section from the A320 to the Hog's Back (A31 junction) in the Road Investment Strategy (RIS). Traffic using the A3 has a significant impact on Waverley and so it is essential that these impacts are mitigated.

As a more general comment, the Council would welcome confirmation that in the detailed assessment of any more significant sites that may have cross-boundary impacts, the impacts on Waverley's infrastructure and services will be considered and, if necessary, addressed.

Conclusions

To confirm our response to the 2014 draft Guildford Local Plan, Waverley acknowledges the considerable effort that Guildford is seeking to meet its identified housing needs and supports the number of homes per annum proposed in the plan which would meet the objectively assessed needs in the SHMA. However, future developments in Guildford have the potential to have an impact on Waverley, both individually and cumulatively.

The Council would again like to stress the importance of and our commitment to continued joint working and liaison between Guildford and Waverley as our respective new Local Plans reach a critical stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E1 states that Guildford will provide for an additional 3,200 additional B Class jobs to be delivered through the allocation of between 37,000 and 47,000 sq m of B1a/b floorspace and between 4.7 and 5.3 hectares of industrial (B1c, B2 and 88) land which is the need identified in Guildford's recent Employment Land Needs Assessment (ELNA) and as such we have no objection to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16941  Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I2 - Supporting the Department for Transport's "Road Investment Strategy" and 13 - Sustainable transport for new developments

Waverley and Guildford Borough Councils have worked closely recently with each other on transport issues, for example by jointly commissioning Surrey County Council to produce the 2016 Strategic Highway Assessment to inform both authorities' Local Plans. The RIS schemes for improvements to the A3 will have an indirect, but nonetheless important impact on the Strategic Road Network as it affects Waverley. The Council would therefore wish to add its support to that of Guildford Borough for the RIS as well as recognising the need for continued liaison between the Boroughs, the Highways Authority and Highways England on the nature and timescales of the A3 improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/16937  Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

The Council supports the approach to the Surrey Hills Area of Outstanding Natural Beauty (AONB) and Areas of Great Landscape Value (AGLV) set out in this policy to that is to keep the boundaries for both until such time as a review by Natural England is undertaken, as it mirrors that of Waverley in its emerging Local Plan Part 1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Policy P2 - Green Belt**

The Council notes and welcomes that Guildford has undertaken a review of its Green Belt in accordance with National Policy Guidance. We also note that Guildford intends to continue to protect the Green Belt, but with some villages to be inset from the Green Belt and six strategic sites in the Green Belt identified for development. The approach of insetting some villages to allow limited infilling is supported as this is consistent with the NPPF. The Council notes the intended removal of some strategic sites and the proposed extension of Green Belt around the Ash and Tongham area. Whilst these changes are mentioned in the supporting text, it would be clearer if they were stated more explicitly in the policy itself.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/16939  **Respondent:** 15658145 / Waverley Borough Council (Elizabeth Sims)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy P5 - Thames Basin Heaths Special Protection Areas**

This policy is consistent with saved Policy NRM 6 of the South East Plan and the Thames Basin Heaths Delivery Framework and so is supported.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
PROPOSED SUBMISSION GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES
(REGULATION 19)

Thank you for consulting Waverley Borough Council on the above document. This response has been approved by the Council's Head of Planning Services in conjunction with the Planning Portfolio Holder.

Waverley acknowledges the valuable co-operation that has taken place between our two Boroughs over the last few years and it is appreciated.

Our comments are as follows:-

Policy S2 - Borough Wide Strategy

The Council supports the housing target set out in Policy S2 of providing for 13,860 new homes (693 homes per annum from 2011 to 2033) as this is the objectively assessed level of housing need for Guildford Borough in the West Surrey SHMA (September 2015). The Council also supports the provision in the plan of additional Gypsy/Traveller pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3633  Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sites – in addition, we note that the A26 site (Blackwell Farm), to the west of Guildford, has been retained with a total yield of 1,800 homes, but that only 1,500 of these dwellings are expected to come forward in the plan period. Compton Parish Council has expressed concerns over the allocation in terms of potential highways impacts on local communities, including Binscombe and Farncombe within Waverley. Again, it would be important for any cross boundary impacts from the development on these communities to be identified and addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3632  Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)  Agent:
Sites – most of the sites proposed for allocation are some distance from Waverley and would therefore not lead to any impacts on the Borough. However, one of these (A29) would deliver 1,750 homes in the Ash and Tongham area, an increase of 550 from the 2016 version of the plan. This includes a development at Grange Farm close to the junction of the A31 and the A331 and close to the boundary with Waverley. There is a current cross boundary planning application (WA/2017/1050) for up to 254 residential dwellings (in Guildford) plus SANG (in Waverley) on this site. As stated previously, it would be important for any impacts from this allocation, including impacts on the Thames Basin Heaths SPA to be addressed in this or any subsequent planning application.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1819</th>
<th>Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy E1 – It is noted that as a result of updated evidence on Employment Land Needs, the amount of Classes B1 a and b floorspace and Classes B1c, B2 and B8 land have been reduced, although the number of jobs to be created has been increased from 3,200 to 4,100. We are unclear how such a large increase in jobs is to be achieved whilst reducing the amount of land allocated, but we presume that this is due to higher job/floorspace densities as a result of technological innovation. It would be helpful if this could be explained.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1818</th>
<th>Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Policy P2 – In our response to the 2016 version of the plan, we suggested that it would be helpful if the intended removal of some strategic sites and the proposed extension of Green Belt around the Ash and Tongham area were explicitly referred to in the policy as well as in the supporting text. We note that this suggestion has not been taken up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1817  Respondent: 15658145 / Waverley Borough Council (Elizabeth Sims)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Woking’s unmet housing needs

The Council notes that, on the basis of the West Surrey SHMA: Guildford Addendum Report 2017, the amount of new housing that the plan provides for has reduced from 13,860 homes over the period 2013-33 (693 per annum) in the 2016 version of the plan to 12,426 new homes from 2015-34 (654 per annum) in this new version. This is a reduction of about 1,400 homes. As you will be aware, the Waverley Local Plan Part 1 (LPP1) was submitted for examination in December. This sought to provide 9,861 homes in the period 2013-32 or 519 homes per annum. Hearing sessions have just concluded and the Inspector has provisionally concluded that Waverley should increase its housing provision to 590 homes p.a., which includes a significant uplift to address affordability issues and making provision for 50% of Woking’s unmet need for the period 2013-2027 (1,575 homes, or 83 dwellings per annum over the plan period 2013 to 2032). Whilst the Inspector made it clear that he was not examining the Guildford Local Plan, he added that Guildford would be strongly pressed at the examination into its Local Plan into why it is not intending to meet some or all of the remaining unmet needs arising from Woking.

In light of this, the Council would strongly recommend that you give further consideration as to whether Guildford BC can also make an appropriate contribution towards meeting the unmet needs of Woking. The Council understands that the revised plan includes a housing buffer of about 10%, which shows that there is already capacity to meet some of Woking’s unmet needs. in addition, it is noted that a number of sites that were included in the earlier draft Local Plan have been dropped from the latest plan for various reasons. Given the unmet need from Woking, it is anticipated that your Council may be challenged to justify why none of these sites are capable of making a contribution towards unmet needs.

During the Examination hearings, the Council identified some potential modifications to address concerns raised by the Inspector. These include a potential modification to clarify that the land between Aaron’s Hill and Halfway Lane, indicated on Plan 2 of Waverley’s submitted Local Plan, can be removed from the Green Belt in LPP1, allowing the Waverley portion of the promoted site to be allocated. The Council recommends that Guildford BC reconsiders its position on this site to allow, preferably, a joint scheme to be progressed across both authorities. The resultant development could also contribute to helping Guildford to meet the unmet needs of Woking.

Policy H1 - The proposal to require 15% of all new homes on sites of 25 homes or more to be accessible dwellings is supported, as is the requirement that 5% of homes on sites of 100 homes or more to be self build or custom build pots if there is a need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4079</th>
<th>Respondent: 15658465 / Michael Cuell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The lack of provision of new schools in line with the influx of increased numbers of children can only mean impact on existing schools.

- As per my point above, the lack of immediate provision of doctor surgeries and health care.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4078</th>
<th>Respondent: 15658465 / Michael Cuell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The absence of the presentation of robust evidence for the alleged housing numbers – this is either down to the fact that the Guilford Borough do not know what they are doing, or symptomatic of everyone with a financial interest in this getting their noses in the trough. Whatever, it is simply unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4077</th>
<th>Respondent: 15658465 / Michael Cuell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Specifically I object to:

- All and any erosion of the green belt
- The site at A43 Garlicks Arch
- The site A43a, the on and off ramp at Clandon, which will cause increased traffic problems in the villages.
- The site A45 The Talbot, this constitutes overdevelopment of a conservation area.
- Site A57, The Paddocks – which is unlawful.
- Any in setting of villages from the Green belt is an outrage; it is the same as removal destroying the historical fabric of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16952</th>
<th>Respondent: 15658465 / Michael Cuell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The plans for development in the Ripley, Send, Pyrford area are an outrage They will destroy protected green belt and diminish the quality of life in the area by adding to traffic congestion, pollution, degradation of the environment, and overwhelming strain on existing public services.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16953</th>
<th>Respondent: 15658465 / Michael Cuell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The disproportionate amount of development work in one area of the Borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<p>| Comment ID: SQLP16/1868 | Respondent: 15658465 / Michael Cuell | Agent: |</p>
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/4084</th>
<th>Respondent:</th>
<th>15658497 / Philip Willians</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The limited consultation period, purposely designed to steamroller objections and push these plans through against the will of the people.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The last minute inclusion of new sites with less than two weeks notice is a sham.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/4083</th>
<th>Respondent:</th>
<th>15658497 / Philip Willians</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/4083</th>
<th>Respondent:</th>
<th>15658497 / Philip Willians</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4082</th>
<th>Respondent: 15658497 / Philip Williams</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT specifically to Ripley and Send Villages being removed from the Green Belt. The green belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming on conurbation. Local councillors and central government gave a clear election promise to protect Green Belt ad this reneges on it, Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7648</th>
<th>Respondent: 15658497 / Philip Williams</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to building 45 houses at Clockbarn Nursery because of the inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take and more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been granted for 64 apartments at the Tannery and for building a marina, both of which will generate additional heavy traffic. The lane cannot take any more traffic. The junction is too dangerous already and will be made much worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7645  Respondent: 15658497 / Philip Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century. The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield.

Guildford’s housing requirements have been shown to be grossly over exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt is not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7646  Respondent: 15658497 / Philip Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work. Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7647  Respondent: 15658497 / Philip Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches. It is an inappropriate location because the narrow width single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1869  Respondent: 15658497 / Philip Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick’s Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4085  Respondent: 15658529 / Trevor Jenkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I refer to the proposed SANG at Tyting Farm and the response from Tyting Society dated July 2016.

I am a member of this society as I am the owner of a house on White Lane [address redacted] which lies on the Western boundary of the proposed access path down from White Lane to the proposed SANG ("WL path").

I fully support the response that the Tyting Society has provided.

I would like to add some clarification to the second point raised in the response - namely "minimising footpath disruption". Having read the guidelines for individual SANGs there are two "must haves" that I think are particularly relevant.

The first is "a circular walk around the SANG" - this will be met without the need for the WL path. Indeed this seems to add another leg that would take the walker back out of the SANG, which appears illogical.

The second is that "paths must be easily used and well maintained". This raises two concerns about the proposed WL path. The primary issue is that the ground for this path is currently heavily overgrown with mixed quality of fencing, and no access point through the fencing at the Southern end. Therefore appropriate fencing will need to be established on both Western and Eastern incurring a significant one-off cost. Thereafter this path will need to be maintained, entailing annual costs.

The secondary issue is that this path does not pass the test of "easily used" as the only way to access this will be from the path to the North of White Lane, which in turn can only be entered from the western end near Halfpenny Lane, or the eastern end by the car park at the end of White Lane. Both of these access points provide a base via existing paths for accessing the circular walk around the SANG, so rendering the White Lane access path basically redundant.

The combination of these two points is that if GBC persists with the extra access, when there is no mandatory requirement to do so, then it is highly likely that this will incur significant capital and running costs with minimal pedestrian traffic using WL path. Such a scenario would reflect badly on GBC’s use of funds for this purpose, compared to other more pressing needs.

If you would like further expansion on these points I would be happy to attend any relevant meetings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/4101  **Respondent:** 15661729 / Jaqueline Tolley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I wish to lodge my comments on the Guildford Local Plan and how it relates to the Horsley area.

1) There has been no valid reason presented to change the Horsley green belt status.

It appears to be driven by developer's desire to get hold of cheap land. What is the point of identifying areas to be protected with green belt status if it can be removed simply. Residents will surely mount a legal challenge to any such change in status.
2) Road infrastructure inadequate already.

Plans to introduce substantial increases in traffic with new housing to the A246 and Ockham Road (both North and South) are ill conceived. At the junction of the the A246 and Ockham Road South we regularly have traffic jams simply to the volume of traffic. In the morning the queues stretch from the junction back along the A246 towards Leatherhead around the corner past the Thacher's Hotel. In the evening this is compounded by traffic coming south off the A3. In less than 200 yards on the A246 around that Ockham Road junction there are 8 entrances/roads. Proposals to increase the volume here is crazy without a major change to the layout. Sight lines on the junctions are already too short and the proposed Thatchers hotel development in particular looks questionable as the hotel will still be operational. Similarly the Bell & Coleville roundabout is already overstretched as it takes the Cranmore school load for parents doing u turns.

3) The estimates of population growth are clearly exaggerated as they far exceed national and even other local area expectations. The failure to publish the model simply underlines this concern. Publish or be damned is surely the right view. To base plans on a projection that cannot be critiqued is plain wrong. I used to work in the City and always had to provide sources for any assertions.

We would like to highlight the wonderful care home development currently being completed on Kingston Road, Leatherhead. This site used an old police station so had minimal green space around it, with minimal impact on the surrounding areas and has created numerous residences. My key point there are plenty of sites (brown sites) that are already developed so would present no impact on green spaces. Building on gardens is a cheap and nasty way - force the developers to redevelop existing sites by limiting the availability of green belt and other similar land.

Guildford council should be more open to the conversion of commercial property to residential.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Target housing number.

The target housing number is unsubstantiated, is nearly 70% higher than current official national estimates for population growth in the Borough and should be reviewed in the light of the referendum result to leave the EU (with the stated intention of reducing immigration associated with EU membership).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4104  Respondent: 15661761 / Rob Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Changes to settlement boundaries.

Similarly, the extension of the Settlement boundaries around East and West Horsley has inadequate basis and will just result in further diminution of the Green Belt of the Borough.

The extent of the proposed new housing within the extended boundaries of East and West Horsley, associated with the proposed village to be created on Wisley Airfield, will have the effect of creating a single town out of 3 existing villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16990  Respondent: 15661761 / Rob Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Removal of greenbelt status.

Regardless of the target housing number required, there are still inadequate “exceptional circumstances” to justify removal of the Green Belt status from any areas of the Borough.

Consideration should be given not only to the next planning period, but also to the rest of the century. At this rate of development, the Borough will be largely built upon within the lifetime of children born this decade. This is an unacceptable situation that should be resisted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16992</th>
<th>Respondent: 15661761 / Rob Harris</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Strategy for location of development.

The destruction of the villages into which the existing inhabitants moved is wrong as it involves a complete change of the environment within which they live.

An increase in the size of Guildford makes a larger town, but does not alter the basic style of living of the people involved. This is a far more appropriate strategy for any development that the Borough needs to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16991</th>
<th>Respondent: 15661761 / Rob Harris</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Wisley Airfield and Gosden Hill Farm.

For the reasons covered above, such extensive development should not be considered as they are unlikely to be needed when a realistic target housing number is established and the greenbelt status reconfirmed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16993</th>
<th>Respondent: 15661921 / Natural England (Marc Turner)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Thank you for your consultation on the above dated 06 June 2016 which was received by Natural England on 06 June 2016.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Habitats Regulations Assessment

Natural England have no comments to make on the Habitats Regulations Assessment accompanying this Local Plan submission.

Sustainability Appraisal

On page 9 of this document, there are a list of Sustainability Objectives by which the Local Plan is judged. Natural England are generally supportive of this list, however we have one minor suggestion to make. With regard objective number 1, Natural England would suggest this is renamed as “Maintain, conserve and enhance biodiversity and the natural environment”. It is obviously very important to conserve and enhance biodiversity, but it is equally important in some cases to maintain and preserve what is already present on the site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18626</th>
<th>Respondent: 15661921 / Natural England (Marc Turner)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Para 4.3.6 – this paragraph notes that there is a lack of national guidance on the matter of the Major Developments test within an Area of Outstanding Natural Beauty (AONB). However Natural England wish to draw your attention to the recent Inspectors Report dated June 2016, into the Vale of White Horse Local Plan Examination in Oxfordshire. This matter was discussed with regard housing allocations within the North Wessex Downs AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16994  Respondent: 15661921 / Natural England (Marc Turner)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5 – Natural England are broadly very supportive of this Thames Basin Heaths Special Protection Area (SPA) policy. The only element missing from this policy is reference to how the financial contributions will be secured by Guildford Borough Council. Would the Community Infrastructure Levy be used? We feel it is referencing this matter either within Policy P5 supporting text, or within the HRA which accompanies this document.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18625  Respondent: 15661921 / Natural England (Marc Turner)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On page 22 of this document, there are a list of Core Themes which run through the completion of this Local Plan. Natural England are generally supportive of this list, however we have one minor suggestion to make. With regard the “Environment” theme, Natural England would the ambition also has the word maintain added to it. As discussed above it is very important to conserve and enhance biodiversity, but it is equally important in some cases to maintain and preserve what is already present on the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield from the Green Belt. No exceptional circumstances have been demonstrated.

I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

I object to inclusion of the former Wisley Airfield, now known as Three Farm Meadows, creating a policy seemingly to counteract the fact of the planning application already being refused by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan because it calls for housing development in the Green Belt. In order to change Green Belt boundaries, there must be demonstrated special circumstances. In order to develop in the Green Belt, there must be exceptional circumstances.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPA16/4121  Respondent: 15664065 / Jo van Herwegen  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sustainability

There are limited employment opportunities within the village, and residents will need to commute to a place of work. This will either be via car (see transport above, with impact on local highways), or via train. The environmental burden of these additional journeys has not been considered in the sustainability assessment.

Village character

The proposed high-density housing sites are totally out of character with the current low density settlement, and will have a big impact on village life. This proposal is non-compliant with the national planning framework as the development does not respect the character and density of housing in the area.

Summary

The developments within the local plan do not take account of the availability of infrastructure or local facilities, nor are they in line with the character and density of housing in the area. I therefore strongly oppose these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7689  Respondent: 15664065 / Jo van Herwegen  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With reference to the above Local Plan, I would like to object to the following sites:

Former Wisley Airfield (site A35)
Thatchers Hotel (site A36)
Bell & Colvill (site A37)
Manor Farm Site (site A38)
Ockham Road North (site A39)
Ockham Road North (site A40)
East Lane (site A41)
Garlick’s Arch (site A43)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17014  Respondent: 15664065 / Jo van Herwegen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure

The level of development proposed within East and West Horsley represents an increase by 35% and is such that the village cannot accommodate that level of development without major investment in infrastructure and other local provisions, especially schools, medical facilities and sewage facilities.

Public Transport

Public transport links East and West Horsley are the train line and infrequent bus service.

The north-bound platform of the train station is not accessible to the frail, disabled, or those with young children as there is no step-free access. Any one travelling London bound, or returning from Guildford who is unable to use the bridge cannot use the Horsley train station and is advised by national rail to get off a stop early (or late) and catch a taxi from Clandon. The provision of a step-free pedestrian bridge over the railway would be required for a sustainable development.

Car parking in the station will also need to be extended to accommodate the additional volume of cars expected from the new sites within the village and Wisely airfield.

Highways

No details have been given on what is planned for the “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023”.

The road network into and around the villages will require significant investment to take the higher volumes of traffic.

Access to the villages is through two routes: ‘The Street’ through West Horsley and B2039 through East Horsley. Both narrow to such an extent that there is not sufficient space for two highway lanes, and road markings disappear. In order to allow the higher volumes of cars pass one-another, the roads will need to be widened to accommodate the increased volume of traffic.

A3 northbound junction at Wisley. Due to the proximity to the M25 junction, there is a conflict between road users travelling London bound from Guildford moving into the A3 exit slip lane to join the M25, and joining the A3 at this junction. The additional volume of traffic joining at this junction will exacerbate current congestion and is likely to lead to more accidents without major investment and re-routing of this junction.

Drainage / Sewerage
The sewerage network within the village is unable to cope with the additional demand from the proposed developments, and will require significant investment to meet this additional load.

**Flooding**

There are areas within the village which are within flood zones 2 and 3, measures are required to ensure current housing does not become more prone to flooding, and water can drain freely (see drainage above).

**Medical facilities**

There are possible proposals to extend the Kingston Avenue Medical Centre. This medical facility is already extremely busy, and an extension at least in proportion to the increase in residents is required to ensure that all village residents have access to essential healthcare services.

Due to proposed additional residents within the Guildford area, major investment will be required within the Royal Surrey County Hospital to accommodate this.

**Schools**

The local plan does not address the additional expansion of educational services required to meet the needs of the extra residents. Currently schools and educational services already experience waiting lists. There is one comprehensive school (Raleigh) within the village which is already full. This will need investment to accommodate the significant number of additional residents.

Given the main secondary school within the area, Howard of Effingham, will have a significant volume of additional houses within its wider catchment area (which is not just limited to East and West Horsley), provisions desperately need to be increased to ensure that sufficient education is available for the larger population.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17013  **Respondent:** 15664065 / Jo van Herwegen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green belt area**

The area is designated Green Belt, and the proposed local plan is non-compliant with the National Planning Policy Framework as the very special circumstances for building on Green Belt have not been met.

The green belt area is the defence from greater London urban area encroaching on the surrey country side and protecting the surrey hills area of outstanding natural beauty.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: pslp173/662  Respondent: 15664065 / Jo van Herwegen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I welcome the removal of sites A36 and A41, however the amendment fails to address the issues stated in my previous letter on the following sites:

Former Wisley Airfield (site A35)
Bell & Colvill (site A37)
Manor Farm Site (site A38)
Ockham Road North (site A39)
Ockham Road North (site A40)
Garlick’s Arch (site A43)

In particular, the amendment does not include sufficient provisions in local infrastructure (road network, sewage, medical facilities, and schools) to accommodate the additional demand driven by these proposed sites. These issues have been clearly outlined in my previous communication with you (17/07/2016) and have not been addressed in the revised plan. I also strongly object to the removal of greenbelt classification within this area, and the exceptional circumstances required to change this status has not been met within the amendment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4134  Respondent: 15664609 / Diane Pengilly  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to the Guildford Local Plan 2016

I object to the Local Plan as 13,860 new houses without adequate infrastructure will damage this area of Surrey in many ways (Policy S1) - it is not sustainable:

- There are insufficient schools and hospitals in the area to accommodate this number of homes - it will bring around a minimum of 50,000 people to an area which is rural/semi-rural and green belt. I object to the destruction of green belt for planning purposes. We have green belt in order to protect greenbelt areas... this makes a mockery of have green belt areas in the first place. Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance. The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

- The surrounding roads will be absolutely backlogged with the additional traffic. The A roads and cut throughs through villages all leading to the M25 will be impassable in rush hour if you introduce this volume of people and their cars (because there is no infrastructure for public transport in these areas around Garlick Arch so they will have to all drive - all the parents, all their offspring, all their visitors).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7701  Respondent: 15664609 / Diane Pengilly  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan does not adequately fulfil the flood risks as advised by National Planning Policy. The Environmental Agency have stated that the site at Garlick's Arch (A43) is a higher flood risk than stated in the Council's Plan and this area has flooded many times in the past. I object strongly that the Council would ignore this considering the flood issues we have experienced increasingly over recent years!

I object to the destruction of Ancient Woodland and the wildlife that lives there. The Council have spent hundreds of thousands of pounds in Surrey redeveloping woodland and heathland to encourage indigenous species and I can't understand why they turn about face to destroy green belt now...? To destroy over 80 oak trees when oak trees are under threat in this country currently...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the damaging of the local environment. People buy homes in these villages because they like living in a village environment with less traffic and less people. I object to villages being grown into each other so you have mass urbanisation and I object to it more so as the area is supposed to be protected from this development because it is green belt! There is no exceptional circumstances for Ripley, Send and Clandon to be removed as per National Planning Policy. You need instead to concentrate on developing the existing brown field site at Burnt Common whilst also considering the impact of this volume of housing and making provision for healthcare facilities and schools on the site to at least alleviate some of the pressures you will cause as a result of this impact in other surrounding areas and the local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am writing to express my concerns regarding the Green Belt status of the area mainly to the south of the A246 in East Horsley.

I feel it is important to retain areas of greenbelt to ensure the character of the areas around London is maintained. By reducing greenbelt the London area is being extended and the south east of England becomes one big suburban sprawl. There is no gain to be made by doing this.

In regards to the additional housing planned for the Horsleys and Wisley airfield the increase in housing is disproportionate to the size of the existing population, the roads and drainage would be unable to cope with this increase and there are also insufficient public services. The schools would not be able to handle the influx nor would the surgery or local hospitals.
It does not seem that the plan is suitable to the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4150  Respondent: 15665697 / Elizabeth Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment which shows that industrial space at Burnt Common IS NO LONGER NEEDED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4144  Respondent: 15665697 / Elizabeth Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the removal of 15 villages, including Ripley and Send, from the green belt. This will lead to wholesale, and often inappropriate developments.

I OBJECT specifically to Ripley and Send Villages being removed from the Green Belt. The green belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send’s Green Belt provides an essential buffer stopping Woking and Guildford becoming on conurbation. Local councillors and central government gave a clear election promise to protect Green Belt ad this reneges on it, Developers will be quick to take advantage and there will be nothing to stop them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7719  Respondent: 15665697 / Elizabeth Cross  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 45 houses at Clockbarn Nursery because of the inadequate access and traffic volume. Tannery Lane is far too narrow and twisty to take and more traffic. The junction with Send Road is already very hazardous for vehicles trying to join the main road. Planning permission has previously been granted for 64 apartments at the Tannery and for building a marina, both of which will generate additional heavy traffic. The lane cannot take any more traffic. The junction is too dangerous already and will be made much worse.

I OBJECT to the fact that the Local Plan takes no account of schools, doctors surgeries and roads that are already operating at full capacity. Another 4000 houses in this area with a conservative estimate of a further 8000 cars would be catastrophic.

I request that my comments are shown to the planning Inspector who will decide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7708  Respondent: 15665697 / Elizabeth Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I OBJECT to Policy A43.30 the proposed development of Garlicks Arch designated for 400 houses and an industrial estate. This is a new site not included in the Regulation 18 draft and has NOT been consulted on previously. It is not only permanently protected green belt but also a site of ancient woodland with some trees planted in the 16th century. The site floods and is covered by ancient woodland. The industrial space is not needed but if it were it should be at Slyfield. Guildford’s housing requirements have been shown to be grossly over exaggerated and they have refused to disclose their calculations. With proper use of brownfield sites this Green Belt is not needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7710  Respondent: 15665697 / Elizabeth Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
**I OBJECT** to policy A43.30 the development of new four way interchange onto the A3 which would mean that narrow Send Road (A247) would be the main route for traffic leaving the M25 and A3. It is already crowded and vulnerable to traffic jams. Further traffic from this development would result in permanent gridlock. It simply would not work. Send would have to take traffic from the proposed 2000 new houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm. Much of this traffic to and from the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would become gridlocked. Noise and pollution levels, already at excessive levels, would worsen. This must be avoided.

**I OBJECT** to policy A44 which would see 40 homes and two travellers' pitches on land west of Winds Ridge and Send Hill. This was again a NEW site NOT included in 18 draft and therefore has NOT been consulted on previously. Once again this is Green Belt land partly containing unsafe landfill. Access is by a narrow lane which could never take the volume of traffic that would ensue from traveller's pitches. It is an inappropriate location because the narrow width single access country road provides insufficient access. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil a high amenity area set in beautiful countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7718</th>
<th>Respondent: 15665697 / Elizabeth Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1888</th>
<th>Respondent: 15665697 / Elizabeth Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I OBJECT to the fact that GBC have not followed the correct process for Send and Ripley developments. Any significant changes to the 2014 proposals, such as the proposal development of Garlick’s Arch, should have required another full consultation, which did not happen. This invalidates the whole process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/4156  **Respondent:** 15666049 / Amanda O'Brien  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The existing roads, schools and health facilities have no plan for funding set out in the plan to address 500 new houses.

Several of the new sites proposed extend the built area out into the countryside which is clearly damaging to the Green Belt where any new building is regarded as inappropriate in government policy.

The council are proposing new village boundaries which extend the built area outwards into the green belt again clearly damaging to the Green Belt where any new building is regarded as inappropriate in government policy.

The proposed new development has been focussed on West Horsley with no Special Purpose being defined as required by policy to promote development in the green belt.

The protection of Birds in the special protection area near Wisley requires special consideration within 5 km. All of the sites in West Horsley and the site at Wisley Airfield are within this 5km. Any new development requires the possible effect on the birds to be addressed by the provision of alternative open space to draw residents away from Wisley. Effingham Common has been identified to serve this propose but in order to be usable for this purpose it requires a public car park which it has not got. Common Rights and planning permission issues may well stop this ever coming forward. This puts in doubt the feasibility of the sites in the long term.

For all of the above reasons we object to the Local Plan and request that the minister addresses the green belt points and confirms that West Horsley remains a green belt village, recognises the uncertainty relating to the protection of the birds and that as a result removes the pink coloured sites as development sites from the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/17082  **Respondent:** 15666049 / Amanda O'Brien  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

West Horsley is defined by Guildford Council as a Green Belt Village

Policies in the Governments National Planning Framework (NPPF) require that new building is regarded as inappropriate in the Green Belt.

These Policies also say that only limited infilling with Housing is appropriate.

Neither of these policies support substantial new development in the green belt.

The Councils Proposals total some 500 new dwellings in the green belt which is clearly contrary to the above policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17083</th>
<th>Respondent: 15666049 / Amanda O'Brien</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In producing the new Local Plan larger sites are proposed west of Guildford to reduce the pressure on the green belt. No benefit is evident to the residents of West Horsley from this reappraisal in fact an increased requirement for housing in their green belt is proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1890</th>
<th>Respondent: 15666049 / Amanda O'Brien</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Previous objections to the Local Plan by West Horsley residents have been totally ignored by the council who have shown no community engagement in producing the current plan with the increase in housing and the expansion of the village contrary to their wishes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4525</th>
<th>Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The former residential and SANG allocations at Land east of Aldertons were previously identified within the SHLAA and fully supported by GBC and are available and deliverable within the short term and we commend that both allocations are reinstated within the draft Local Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Barratt David Wilson Homes – July 2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7722</th>
<th>Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Land at Aldertons Farm and SANG land due west of Aldertons Farm</td>
<td></td>
<td></td>
</tr>
<tr>
<td>In respect of the ‘Land at Aldertons Farm’, despite previous support from GBC the removal of the allocation from the previous draft is not supported. Compelling reasons for the site’s inclusion were previously put forward, accepted by GBC and still very much remain in place and we believe that the site is capable of providing a sensible option for growth within the Borough to help contribute towards the housing need in the immediate to short term. In addition, the previously allocated SANG provision would provide a key piece of infrastructure that would allow new homes to occupied without any reliance on any third party landowner. This SANG, the design of which has been approved in principle by Natural England, would provide 8ha of new publicly accessible open space for the benefit of new residents of any potential development and existing residents of the Village. The delivery of this SANG is further enhanced by the fact that both the residential and SANG components are under a single ownership which demonstrates deliverability.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
In summary and to reiterate:-

Aldertons Farm is for a 6.2ha site situated to the east of Aldertons Farm south of Send Marsh Road, Send Marsh. Barratt David Wilson Developments has a contractual arrangement with the landowners and as such, the site is deliverable once consent is issued and all planning conditions and obligations have been met. Barratt David Wilson Homes is one of the largest housing developers in the UK and has the funds available to make an immediate detailed planning application on this land should it be allocated. This site has the following benefits:

- It is available and deliverable in the short term (1-5 years)
- It is surrounded by residential properties on 3 sides
- It has an existing access off Send Marsh Road
- Capacity to provide for circa 120 residential units
- The site is in a sustainable location for housing
- Low risk flood zone (zone 1)
- No major ecology constraints
- No harm to the setting of Aldertons Farm
- Mature landscaping to key perimeter boundaries
- Adjoining SANG at Aldertons Farm (Site 106 – July 2014 draft LP) Design agreed in principle with Natural England. The SANG also has the capacity to allow other sites within 4km to come forward, therefore unlocking further supply.

Barratt David Wilson Homes (Southern Counties) has a proven track record of delivering high quality residential development in the south east of England and would seek to implement any planning consent on this land without delay, providing more certainty on delivery in years 1-5 of the plan period.

In terms of the present Green Belt status of the site, Paragraph 80 of the NPPF reinforces the five purposes of the Green Belt, as follows:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Whilst any proposed development of the site at Aldertons Farm would clearly increase the size of Send Marsh, concerns over an ‘unrestricted sprawl’ would be allayed by the neighbouring SANG land which would likely be transferred to the council and thus preserve the status of the countryside to the western boundary. With the land abutting existing residential to the other 3 boundaries there is a clear, defined boundary with which to check any sprawl. The sites location would not lead to any pressure of merging with neighbouring towns.

The approach towards the allocation of smaller sites within the document is supported, as it assists in helping to bring a range of locations and options for growth to the Borough at a more measured and sustainable rate and a more certain supply of housing to allow time for the strategic sites to be delivered later on in the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sustainability Appraisal – ‘Land at Aldertons Farm’

The Council have published their Sustainability Appraisal (June 2016) alongside the draft plan and the intention is that this SA ‘identifies, describes and evaluates’ the likely significant effects of implementing both the plan, and the ‘reasonable alternatives’.

The overall content of the SA demonstrates how the approach to ‘reasonable alternatives’ has been carried out and within the document, Table 6.2 ‘Spatial Strategy Alternatives’ reveals that a total of 8 Options were considered which all reflected the OAN with a range of alternative % buffers added. In 7 of the 8 Options the ‘Land at Aldertons Farm’ was included (Send Marsh amber rated sites) within the aggregate housing total and identified as one of the spatial strategy alternatives. With this being so, ‘Aldertons’s Farm’ was clearly assessed and determined to be a viable option for growth by GBC in several OAN scenarios and indeed, within the SA, Section 6.3 ‘A stepwise process to develop reasonable alternatives’, the alternative spatial strategies were assessed against both growth and location options and a footnote on page 29 to the comment of ‘best performing site of the three sites at Send’, states that:-

‘Aldertons Farm (c.100 homes) benefits from being located to the north of the village, away from the A3 (recognising the objective of avoiding continuous development along the A3 and maintaining the gap to Guildford’.

In light of the above, the decision therefore to omit ‘Aldertons Farm’ from its previous allocation appears at odds with the assessment given within the SA. The late decision to allocate ‘Land at Garlicks Arch’ (Allocation ref A43) in place of this appears contrary to ‘avoiding continuous development along the A3’ given its location and in a similar vein to strategic allocations elsewhere in the Borough, is subject to significant infrastructure coming forward to enable development. Namely, a new slip road and junction on to the A3 close to Burnt Common. Again, this places serious concerns over the reliability of supply derived from this site, particularly in the short term. Without getting into too much detail it is unclear whether the capacity of this site has been robustly tested. There are a number of technical constraints that need to be considered such as flood risk, noise disturbance and the presence of ancient woodland which could reduce the development footprint. It is also unclear if Highways England support new access arrangements onto the A3 in this location. It should be noted too that Allocation A43 was included at late notice and without prior consultation before it was reported to the Full Council meeting in May 2016.

In terms of comparing ‘Aldertons Farm’ with other sites that could come forward from ‘Inset villages and infill development within identified Green Belt villages’ within the SA, an accompanying ‘Site options Appraisal findings’ matrix is included within the appendices. When reviewing ‘Aldertons Farm’ against other sites which have been selected in the ‘Horsley’s’ for example, the number of ‘reds’ and ‘ambers’ are comparable, even though access to some of these other allocations is unclear and are also reliant on SANG within third party control before they can come forward. It seems perverse that Alderton’s Farm, an unconstrained and immediately deliverable site has been omitted from the plan in favour of site’s which do not appear to have a satisfactory access. (A38, A39 and A40). Whilst these ‘green belt villages’ are rightly identified as a source of supply, there appears little consistent rationale applied to the choice of site for allocation.

In view of the above there are serious concerns over the soundness of the plan in being able to demonstrate a 5 year supply of housing. The latest AMR states within Table 3 ‘Calculation of five year supply’ that only a 1.4 year supply of housing can be demonstrated and that it will not be until 2022/23 (at the earliest) that the OAN figure of 693 is met. From the base date of 2013/14, and just in the first two years of the housing land supply, a deficit of 1007 homes against the OAN figure of 693 has already accumulated.

The allocation of the Alderton Farm site, promoted by a national housebuilder, would provide an immediate source of supply in years 1-5 and go some way to addressing the immediate shortfall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy H1 – Homes for All

Barratt David Wilson Homes support this Policy and welcome the aims of providing a wide choice of homes and a mix of tenures, types and sizes as appropriate to the site location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

This Policy acknowledges that the delivery of the Local Plan hinges on the provision of infrastructure (Transport, Utilities, Green Infrastructure, Education, Emergency Services, Health & Social Care, Community Facilities, Waste Transfer) and that this should be provided and available when first needed to serve occupants and users of the development. Furthermore, the Policy states that GBC will prioritise Thames Basin Heath SPA Mitigation when allocating CIL receipts.

The Infrastructure Schedule (Appendix C), sets out 13 SANG allocations, including 3 current spaces. It is important for there to be clarity on the remaining 10 spaces in respect of the timing of their delivery, particularly in instances where the SANG in question and the development allocations reliant on them are in different ownership, as it is crucial that these elements of green infrastructure are brought forward in time and in a coordinated manner.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17091  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst there is general support for the aims of this proposed policy, given the high prevalence of Green Belt within the borough and the comments referred to in Policy S2, it is considered that in order to support further long-term growth needs, it should not rule out a suitable review mechanism in the future. In the event that any sites proposed in this document were to stall or fail to come forward for any reason there needs to be an effective tool in which to review the Green Belt boundaries.

It is also critical at this point to support the message within paragraph 4.3.16, which states that ‘we (GBC), consider that exceptional circumstances exist to justify the amendment of the Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17091  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In respect of the main body of the plan, Barratt David Wilson would like to make the following general comments below in regards to the content of the plan;

Policy S2 – Borough Wide Strategy
Whilst the provision for 13,860 new homes in the Borough across 2018-2033 is supported, Policy S2 does not indicate where housing supply will come forward between the present day and 2018. Table 1 within the supporting policy text assumes that by 2018 a supply of housing will immediately be realised from the settlements identified within the table, despite the fact that we estimate that of the 13,652 homes identified, over 60% are derived from strategic allocations where a ‘loose’ delivery period of 1-15 years is indicated. This admission alone suggests there is no clear certainty as to when these allocations may start delivering housing numbers and there needs to be a clear delivery of sites in years 1-5 of the plan.

Crucially these strategic allocations are also all heavily predicated on significant infrastructure projects coming forward to enable development, and, as such, question marks must be raised towards the numbers being realised at the rate assumed in the annual housing target. With such a heavy reliance towards strategic allocations and a well-documented historical under supply of housing across the Borough since the 2003 Local Plan, the assumption of 500 homes being delivered in 2018/19 and a further 550 homes in 2019/20, is considered to be extremely ambitious and unachievable. Indeed, it is not until year 2022/23 that the OAN figure of 693 is forecast to be met (700 homes) and this leads to a scenario whereby the OAN will not be achieved for 6 years from where we stand in the present day. Paragraph 4.1.10 acknowledges the point that the forecast housing number is ambitious stating, ‘this (housing delivery) is a higher level of development than experienced in Guildford borough during the previous Local Plan period’.

This point is reinforced by evidence within the most up to date Annual Monitoring Report -2014/15 (October 2015), Table 1 illustrates the completions of new homes in the Borough from 2006/07 through to 2014/15. The continual undersupply of housing completions is evidenced by the fact that between the years 2008/09 through to 2014/15, a total of 1420 new homes were built in the 7 year period, at a rate of 203 per annum, which is way below both the interim housing number of 322 per annum unilaterally agreed in May 2012, and is less than a third of the OAN option figure of 693 per annum supported within the Sustainability Appraisal and Housing Market Assessment carried through in to this present draft Local Plan (July 2016) Policy S2.

In light of the above paragraph, whilst the provision of 13,860 is welcomed, it does not go far enough in terms of addressing the OAN and includes no buffer provision in the event of allocated sites failing to come forward. This figure needs to be upwardly revised to capture historical evidence and the heavy reliance on strategic sites.

This historic undersupply and poor track record of delivery coupled with the heavy reliance on strategic allocations places serious concerns about the soundness of this draft plan in respect of its ability to identify a 5 year housing supply and indeed the total housing numbers identified. These numbers need to be supported by sites which can come forward early in the plan period, as endorsed within paragraph 6.3.15 in the Sustainability Appraisal which states:-

The need to distribute growth in a sequential fashion, in-line with the established hierarchy of places, is an important consideration when examining the ‘reasonableness’ of a given distribution option. However, there are also other considerations. Notably, there is a need to support sites that:

1. A) are deliverable, in that homes can be delivered particularly early in the plan period;
2. B) bring wider benefits through the delivery of strategic infrastructure; and/or

This paragraph makes it clear that whilst it is important to distribute growth in a sequential manner, according to hierarchy of places, there are also other considerations which should include sites which are deliverable, especially early on in the plan period. The point is essentially to consider a wider choice of the ‘type’ of site that could contribute to the housing supply, to provide a broader range of options should other sites stall, or fail to come forward for any reason.

It is also not clear within the main body of the document how the homes identified within ‘inset villages and infill development within identified Green Belt Villages’, will address the need of SANG provision if required. It is not clear whether adequate SANG provision will be available in time to serve these allocations and again, if they are reliant on larger strategic SANG coming forward, it is unlikely that they will come forward in a coordinated manner if they are in different ownership. No new housing can be occupied until the SANG is provided.

The Local Plan seeks to allocate a number of large strategic sites to deliver around two thirds of their housing requirement in the plan period. In terms of delivery period, the council suggests these sites will be delivered between years 1-15 which
is wholly unlikely. As one of the largest housing developer’s in the UK, Barratt David Wilson has considerable experience in bringing large sites forward and understands the complexities and time it takes to do so. Whilst there is no objection to this overall strategy and there is some logic that larger sites are better placed to provide key infrastructure, it has to be recognised that they take much longer to deliver.

The sites at Gosden Hill Farm and Blackwell Farm require considerable elements of key infrastructure such as new junctions onto ‘A’ classified roads and new train stations requiring the co-operation of Highways England, National Rail and landowners.

Whilst it is right that developments of this scale would need to mitigate their impacts such significant items of infrastructure are complex and difficult to agree and deliver. Such key elements of infrastructure would be substantial and would probably need to be delivered before new housing could be occupied which could easily take 2 years from any detailed consent. To suggest that housing from these sites could be delivered from year 1 would assume that an outline application is submitted on adoption of the plan, approved, then reserved matters applications submitted and approved, conditions discharged, work started and houses occupied – all within 12 months which is unrealistic. Given the complexity of the sites it has to be highly unlikely any housing completions would be derived from these sites within the first 5 years of the plan. The delivery period for these sites should be years 5-15.

Land at Wisley Airfield

Notwithstanding the fact that this site does not represent a logical or sensible allocation in terms of its irregular shape and relationship with existing land uses, again there are significant infrastructure issues to be resolved with Highways England on this site particularly with access improvements to the A3 and Junction 10 of the M25. The Guildford Borough Transport Strategy 2016 which forms part of the evidence base of the local plan suggests that improvement works to this junction would not be complete until 2022.

An outline planning application was refused by GBC earlier this year for a number of reasons, one of which was impact on the A3/M25. If the proposal is reliant on M25 Junction 10 improvements to be in place before occupation of units, housing could not be delivered from this site until 2022. Again the delivery period for this site should be years 5-15.

Land to the south of Normandy and north of Flexford

This would be a highly visible development in a sensitive landscape setting. There are other development options that do not have such a degree of landscape impacts. It is clearly for the council to judge whether the provision of key infrastructure such as a secondary school, outweigh the harm to the landscape. Again, should the site become allocated, given the scale and complexity of the proposals, it is unlikely that housing could be delivered in the first 5 years of the plan.

Given the comments above, we believe that consideration needs to be taken towards allocating further, smaller sites which are more likely to provide certainty of delivery in the short term in order to help address the immediate housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17095</th>
<th>Respondent:</th>
<th>15666113 / Barrat David Wilson Homes (Nick Keeley)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
CONCLUSIONS

This submission is made in representation to Guildford Borough Council’s Draft Local Plan consultation (July 2016) by Barratt David Wilson Developments Southern Counties.

The proposed housing number of 13,860 for the planned period of 2018-2033 is supported as a minimum figure but requires increasing and modifying as per our comments on the section Policy S2. However, the reliance on a high percentage of strategic allocations to provide two thirds of the housing supply is objected to on the grounds that it could provide a very inflexible rate of housing supply, with little or no contribution until the back end of the plan period. The requirement for major infrastructure to support these strategic allocations coming forward does not take in to account viability, land availability and finance and is reliant on several stakeholders and landowners working in a collaborative manner.

Barratt David Wilson Homes welcome the sensible release of Green Belt sites across the Borough but believe consideration should be given to applying an appropriate buffer given the councils historic and consistent under supply. This will provide further options and choice and to provide housing in the nearer future. The housing need is now and not in years 10 to 15+.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1891  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On balance it is considered that the Evidence Base used to support this draft Local Plan (as listed within Appendix D - ‘Evidence Base’), is adequate, up to date and relevant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1892  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Yes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1893  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst we support the Council’s intention in seeking to meet its objectively assessed housing need, we believe that further modifications are required before the plan can be found sound. The fact that the housing numbers are heavily ‘back loaded’ causes concerns that the immediate significant shortfall in the housing land supply is not addressed and that a five year housing supply is unlikely to be achieved which is a requirement of the adopted plan. The reliance on bringing key items of infrastructure forward for a significant proportion of identified sites poses a risk on supply coming forward early in the plan period at a sustained rate and does not allow for choice or competition within the market.

There also appears to be several inconsistencies within the spatial strategy and between comparable sites that have been allocated and those that have not. The plan needs to identify more sites that are deliverable in years 1-5 of the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1894  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Yes. It appears through the supporting evidence base that collaborative working with neighbouring authorities has been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1895  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate?</th>
<th>( )</th>
<th>is Sound?</th>
<th>( )</th>
<th>is Legally Compliant?</th>
<th>( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Yes, we would like to participate in the Examination at that stage please.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

### Comment ID: pslp171/2418  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate?</th>
<th>( )</th>
<th>is Sound?</th>
<th>( No )</th>
<th>is Legally Compliant?</th>
<th>( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The reduction in the housing requirement is unsound because it is not justified.

The deletion of the strategic site in Normandy/Flexford appears to have influenced the decision to reduce the overall housing target to 12,426 homes, from the 2016 draft Local Plan target of 13,860 homes. However, the justification put forward for this revised figure is considered to be weak and made despite strong evidence to the contrary which supports the previous 2016 target as a minimum figure, including:

- a chronic shortage of housing across the Borough,
- market signal across the HMA, highlighting affordability issues through lack of supply,
- evidence across the wider HMA that the identified unmet need from Woking BC has failed to be adequately addressed

The reduction of the overall housing figure is based on the whole premise of weaker economic and job growth forecasts in GBC. Crucially, it fails to consider the level of job growth elsewhere in the HMA and other neighbouring areas. The latest SHMA addendum only examines economic growth scenarios for Guildford and does not consider the implications for the rest of the HMA or, indeed, whether lower growth forecasts are applicable across the HMA. As Planning Practice Guidance sets out that employment trends and growth in working age population should be considered across the HMA, the approach taken by Guildford is not consistent with national policy.

The Housing Trajectory table (Land Availability Assessment – June 2017) states that in years 2017/18 and 2018/19 a housing provision of 310 and 309 could potentially be yielded from approved and commenced planning permissions. Moving forward to year 2019/2020 this increases to 576 homes but each of the first 3 years of the plan are well below the ‘original’ annual target within the West Surrey SHMA (2015) of 693 – revised down to 654 in the 2017 addendum. Given the poor track record of delivery of housing in the Borough, the fact that the 654 (or 693) figure would not be exceeded until 2021 (at the earliest), does not provide confidence that the undersupply of housing will be properly addressed over the first 5 years of the plan.
Furthermore, the new paragraph 4.1.9a (page 30), states that the figures in the Annual Housing Target table sums to 12,426 homes. This statement is not true. The figures sum to 9,810. To sum to 12,426 the target of 654 dpa must be included for the first four years of the Plan period which isn’t the case. Whilst this is recognised in the 2017 Addendum to the Land Availability Assessment (LAA) the Council must be clear in the policy and supporting test to ensure that the deficit accrued during this period is properly considered.

Our concerns regarding the deliverability of the plan are exacerbated given the fact that the Council cannot show a sufficient supply of land for the first 5 years that the plan will be in operation. In the Housing Topic Paper the Council have not stated whether they propose to use the Sedgefield or Liverpool approach to assessing five year supply. It would appear that the Council will be looking to address backlog over the full plan period (The Liverpool method). This is not the approach favoured in the NPPG. In order to accord with national policy, the Sedgefield method should be used to ensure that the backlog is delivered as quickly as possible and not ‘put off’ until later in the plan. We would agree with the Council’s application of the 20% buffer to take account of the persistent under delivery of housing in the Borough.

The plan cannot be found sound if it is unable to demonstrate a 5 year housing land supply and therefore the council needs to identify housing sites that are able to come forward in the first 5 years of the plan to meet the current chronic housing shortage in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp17q/436  Respondent: 15666113 / Barrat David Wilson Homes (Nick Keeley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

By reducing the housing requirement in the plan to 12,426 new homes the Plan is unsound as the Council have failed to plan positively in relation to meeting the needs of neighbouring authorities.

We continue to have concerns regarding the Guildford Borough Council’s (GBC) co-operation with its partners in the Housing Market Area. Whilst Waverley BC is seeking to meet its needs, Woking BC continue to plan on the basis of their adopted Core Strategy. Woking’s Core Strategy sets out its housing requirement as 292 dpa, this is 225 units below the OAN as established in the 2015 West Surrey Strategic Housing Market Assessment. As such there is clearly a significant amount of unmet housing needs within Woking and that consideration needs to be given within the HMA about how this unmet need is going to be addressed. This issue was raised by the inspector as part of the examination of the Woking BC Core Strategy.

There is no evidence to suggest that GBC has considered the matter of Woking’s unmet need and as such the plan fails to pass the soundness test in terms of its duty to cooperate with neighbouring authorities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4164  Respondent: 15666625 / Anna Ruddy  Agent:
1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4167   Respondent: 15666625 / Anna Ruddy   Agent:

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7729  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7731  Respondent: 15666625 / Anna Ruddy  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BB).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site.

There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPS16/7733  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17115  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick's Arch - Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17118  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to the loss of rural employment (Policy E3)

Policy E3 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17132  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

1. To help private providers market local touri This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
2. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17128  Respondent: 15666625 / Anna Ruddy  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT {POLICY H1- Homes for all} Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog's Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17130  Respondent: 15666625 / Anna Ruddy  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY H3 - Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17123</th>
<th>Respondent:</th>
<th>15666625 / Anna Ruddy</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.
1. I OBJECT to the lack of proper infrastructure planning for sites (Policy 11)

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents' in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP1617125  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP1617127  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17112  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a 'special circumstance' and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.

Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17114  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17107  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17110  Respondent: 15666625 / Anna Ruddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

1. The Housing number is based on pre-Brexit data for economic and population growth, including These now need to be revised downwards, possibly quite seriously.

1. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.
It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation of Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in a coalescence and merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17136</th>
<th>Respondent: 1566945 / Julian Dickinson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Aside from the disregard for the Green Belt, there seems to be absolutely no consideration as to the impact that the construction of thousands of new homes (and the subsequent significant increase in the local population) will have on communities and in particular local infrastructure.

The Street in West Clandon, may for historic reasons be deemed an A road, but in reality is nothing more than a local B road. Traffic is already very heavy and the road in some parts too narrow which leads to large lorries and or coaches having to mount the pavement (in many cases at inappropriate speeds) to avoid the oncoming traffic. I have lost count of the number of occasions we have had to repair our fence over the past 12 years owing to cars that have lost control and driven through it. We have had to do so twice in the past 12 months alone. The significant increase in traffic that your plan would create will only make this road increasingly dangerous and I fear it is only a matter of time before somebody is seriously hurt, or worse killed.

I think too about the impact on local train services from Clandon station, especially at rush hour, where already commuters are forced to stand for significant portions of their journey to and from London. Also the pressures on doctors surgeries where even at the excellent Merrow Park surgery it can take 2 weeks or longer to book an appointment for anything other than an emergency.

This is not ‘nimbyism’ on my part. My ‘back yard’ is already over-populated. The roads are supporting more cars than they were originally designed for, rail services are overcrowded, doctors surgeries and hospitals are struggling to cope with the demands being made of them. This is not an exhaustive list.

Never has the Green Belt and the purpose for which it was introduced been so relevant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
As a resident of West Clandon I am writing to object to Guildford Borough Councils 2016 Draft Local Plan. In itself the proposal to develop on land that is designated as Green Belt and as such intended as a buffer against the increasing pressures from ‘urban sprawl’ is of significant concern. It sets a dangerous precedent from which there would be no going back. If areas of Green Belt land are now so readily considered for development, what would be next, ‘Conservation Areas’?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


THPT is a Multi-Academy Trust which was created in November 2013 and is led by Howard of Effingham School which is an ‘Outstanding’ school and is a designated Academy Sponsor. As the first federation of schools in Surrey, formed in 2007 at the request of the Local Education Authority (LEA) and Department for Education (DfE), the school has a longstanding tradition of highly effective partnership working.
The Multi-Academy Trust is currently comprised of eight schools (three secondary and five primary – including infants and junior). THPT continues to be asked by the LEA and DfE to work with other schools to enhance on-going development of effective partnerships across both primary and secondary phases and to help raise standards of student achievement throughout Surrey. The Trust believes that integral to its on-going success is ensuring that staff and students have access to the highest quality learning environments and facilities.

The Trust is currently pursuing proposals, in partnership with Berkeley Homes (Southern) Ltd to secure new school premises for its lead-school in Effingham – Howard of Effingham School. These proposals were supported in the Draft Local Plan (2014) but have been refused planning permission and are subject to a current Planning Appeal.

These representations focus on the current Borough-wide infrastructure policy and site allocations for education in the Proposed Submission Local Plan, and the background documents which seek to justify those allocations. They begin with a review of National Policy, followed by a summary of our understanding of the Local Plan policies for education and its evidence base, and a review of that against the soundness tests in the National Planning Policy Framework (NPPF). They conclude that as drafted these policies are fundamentally unsound.

**National Policy**

Government policy since 2010 has placed an increasing emphasis on the role of schools as independent institutions in driving improvements in national education performance. The Government has strongly encouraged schools to become self-governing, through the promotion of Academies and the expansion of successful schools to maximise parental choice. Whilst Local Education Authorities (in this case, Surrey County Council) have a statutory role in ensuring sufficient school places in their areas, the 2011 Education Act included a presumption in favour of Free Schools and Academies providing these places.

This approach has been re-emphasised in the most recent Government policy. In March 2016, the new Education White Paper – Educational Excellence Everywhere extended the focus of the Coalition Government administration on driving national improvements by giving greater autonomy and leadership roles to Outstanding schools. The White Paper states that:

"We believe that the fastest and most sustainable way for schools to improve is for government to trust this country’s most effective education leaders, giving the freedom and power, and holding them to account for unapologetically high standards for every child, measured rigorously and fairly. This system will respond to performance, extending the reach of the most successful leaders and acting promptly to reduce the influence of those who aren’t delivering for our children. But it will also do more to set up these leaders for success, ensuring they have the necessary tools to seize the opportunities provided by greater autonomy and ensuring that for as it is required, support is available for them to draw on when they choose. This model underpins every one of the reforms set out in this White Paper” (para 1.14).

The White Paper promotes the role of Multi Academy Trusts in achieving this. Howard of Effingham School is the lead school in a Multi Academy Trust and is also an ‘Outstanding’ school in its own right. It has identified the need for new premises, both to maintain and enhance its role as an outstanding school, and also to meet additional local needs.

This approach to education policy is reflected in national planning policy. Paragraph 72 of the National Planning Policy Framework (NPPF) is set out in full below:

"The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

They should:

Give great weight to the need to create, expand or alter schools;

Work with schools promoters to identify and resolve key planning issues before applications are submitted”.

The highlighted part of the text emphasises that local authorities should not just be planning for new infrastructure to meet the needs of development in their areas, but also expanding and improving schools to promote choice.
The NPPF and the Government’s earlier policy statement, Planning for Schools Development (2011), emphasise the need for local authorities and schools to work together pro-actively from an early stage to plan for state school development. Schools have an important role to play in the development of policy and priorities.

This adds emphasis to the Government’s requirement that one of the strategic priorities of local plans should be:

“the provision of health, security, community and cultural infrastructure and other cultural facilities” (para. 156).

Overall then, national policy places a very strong emphasis on the need to plan for the creation, expansion and alteration of schools, in a pro-active way, with schools themselves in order to enhance education standards and meet local community needs. As well as being consistent with National Policy, in order for plans to be found sound they must be positively prepared, justified against reasonable alternatives, and effective (deliverable).

 Proposed Local Plan Policy

Policy I1 of the Proposed Submission Local Plan sets out the Council’s preferred approach to infrastructure delivery, including schools. This cross-refers to an Infrastructure schedule at Appendix C of the Plan. The section on secondary school provision in the Appendix is set out on pages 300 to 302.

Compared with proposals in the Draft Local Plan (2014), the Proposed Submission Local Plan allocates land for three new secondary schools, all as part of new strategic developments. These include: a minimum 4FE school at Gosden Hill Farm Strategic Site; a 4FE school at the former Wisley Airfield (which has recently been refused planning permission); and a 7FE school at the Normandy/Flexford strategic site. Whilst the evidence identifies an immediate need for new school capacity, the Housing Topic Paper suggests that the majority of provision on these sites is anticipated post-2027 (paragraphs 4.162 and 4.126). The Proposed Submission Local Plan is silent on the need to expand or alter schools to meet existing and future needs and on how widening choice in education might be achieved.

Neither the Housing Topic Paper nor the Guildford Draft Local Plan Education Review (2016), which was also published alongside the Proposed Submission Local Plan, set out when schools would be likely to be provided on these sites, by whom and whether they can meet needs in a timely manner. Pages 576 to 581 of the Land Availability Assessment (LAA) (2016) undertake what we regard as a limited and arbitrary assessment of potential secondary school sites. In particular, it does not consider suitability, timing or deliverability of the sites concerned.

On the basis of these limited and superficial assessments, the Council has removed all three secondary school site allocations in the previous Draft Local Plan (2014), and replaced them with entirely new sites in the Proposed Submission Local Plan.

The Council did not, contrary to clear guidance from Government, seek to engage with Howard of Effingham School a known interested party with whom the Council had been involved in pre-application discussions on the proposals which are currently subject of a planning appeal, to identify its needs for expansion or alteration, or its views on existing education requirements, the emerging conclusions of the LAA or other local plan evidence base documents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1899  Respondent: 15667105 / The Howard Partnership Trust (Vicky Lochead)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Soundness

It is therefore our view that the Council’s approach to education planning in the Proposed Submission Local Plan is fundamentally unsound, for the following reasons.

Failure to positively plan for education needs, including the needs of existing schools.

The Proposed Submission Local Plan and accompanying documents undertake a very high-level assessment of the need for school places but do not undertake any proper analysis of the timing of requirements or a proper matching of the location and nature of demand for places. Moreover, the only specific references to the Howard of Effingham School, and its ability to meet needs, in the appendix to the LAA (2016), are factually incorrect.

There is an existing shortfall of education capacity and the most recent School Organisation Plan (2015/16 to 2024/25) identifies rising demand for secondary school (Year 7) places across that period. As we have noted above, the Council suggests that none of the strategic sites hosting schools are likely to commence before 2020/21, and secondary schools typically take 18 months to two years to build. In addition, the process of setting up a new school tends to be a much more protracted and costly process than expanding an existing school.

The Council has not engaged positively with Howard of Effingham School as part of the Local Plan process to address either its capacity to meet either current or future needs. The Proposed Submission Local Plan is entirely silent on how current schools can be expanded or altered.

Failure to demonstrate that the approach to school delivery is appropriate against reasonable alternatives

Planning to meet education needs is an important priority for the Government, and should be undertaken in partnership with schools themselves in accordance with clear principles established in national policy. In this stage of the Local Plan process, the Council has deleted three allocations and replaced them with entirely new allocations with no direct consultation with a Multi-Academy Trust that operates its main school on one of the originally allocated sites.

The ‘RAG’ approach used to justify allocations in the LAA (2016) and the Sustainability Appraisal is superficial and does not properly consider any of the detailed issues which need to be addressed in identifying the appropriateness of sites for schools. The assessment of sites appears to be based on qualitative statements with limited explanation as to why previously allocated sites have been removed. The proposed allocated site at Normandy and Flexford has the same level of Green Belt ‘sensitivity’ as the Effingham site and yet an exception has been made.

Failure to demonstrate deliverability (effectiveness) of allocated schools and sites

Appendix C of the Proposed Submission Local Plan, which sets out the detail of school site allocations, provides very little information on how schools might be delivered. It identifies broad school sizes (in forms of entry), but provides no timing of delivery and no identified delivery partner other than an ‘academy’ or ‘academy partnership’. The wording is exactly the same for each allocation. The section on funding is equally limited with assumptions that developers will provide land for free and fund the full build costs.

In contrast, the proposed expansion of Howard of Effingham has a deliverable approach, which could happen in the early years of the Plan, with a specifically identified site, an identified, experienced and successful Multi Academy Trust to operate the school and an identified delivery partner and funding mechanism.

Neither the Plan nor its supporting documents refer to the very significant challenges faced in opening a new school from scratch in a new strategic development, or the issues around cost, and quality of the range of opportunities which small four form of entry (4FE) secondary schools face. Two of the proposed three schools could be 4FE.

Conclusion

The previous Draft Local Plan (2014) allocated Howard of Effingham School, Effingham Lodge Farm and Brown’s Field (Site Allocation 69) to provide an expanded school together with enabling development for new homes. This allocation has been removed in the Proposed Submission Local Plan but in our view remains an appropriate, deliverable and sustainable means of meeting education needs in this part of the Borough.
The Howard Partnership Trust is keen to work constructively with the Borough Council to bring the Effingham site forward and would be happy to discuss any of the above points in more detail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/4169  Respondent:  15667489 / Tibbalds (Jon Herbert)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strategic Road Network Infrastructure Allocations SRN9 and SRN10

Background

Send Parish Council object to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road, to be delivered on the land covered by allocation A43a. A review of previous iterations of the Local Plan and the associated evidence base shows that these draft allocations have been made very recently and have not been properly appraised.

The July 2013 Infrastructure Baseline study considered the quality and capacity of the existing infrastructure in the Borough and was used to inform the more detailed infrastructure and transport strategies developed throughout the Local Plan process. Chapter 2 of this document identified the A3 as the key Strategic Road Network (SRN) in the Borough and recognised that the form and standard of the A3 through the borough was deficient in quality and capacity, resulting in congestion and unreliable journey times. This baseline has been used to influence the allocation of sites and how infrastructure could be upgraded.

Local Plan Transport Infrastructure Allocations

The various iterations of the draft Local Plan from October 2013 through to June 2016 set out the following approaches to transport infrastructure in the Borough.

The October 2013 Issues and Options Local Plan recognises the need to balance development with traffic congestion and minimise the impact of traffic on local communities. The document also recognises the need to focus new development that will generate significant movement in locations where the need to travel will be minimised and the use of sustainable transport modes can be maximised. This document does not set out specific allocations for transport infrastructure.

The July 2014 Draft Local Plan contained more detailed policy relating to transport and infrastructure. Policy 17 states that the key infrastructure needed to support plan delivery is provided in the infrastructure schedule at Appendix B. This schedule makes no reference to any requirement for a new junction at the A247. This version of the Local Plan allocates 431 homes in Send and Send Marsh / Burnt Common.

The Guildford Borough, Economy and Executive Advisory Board met on 13 April 2016 to discuss the draft version of the Proposed Submission Local Plan. The supporting briefing note states that delivery of the development contained within the Proposed Submission Local Plan is dependent on the delivery of the necessary infrastructure. The infrastructure schemes that the Council considered to be necessary for the delivery of the Proposed Submission Local Plan were included in Appendix C. Allocations SRN9 or SRN10 are not included in the schedule and no other references were made to the need for these schemes.
The Guildford Council Executive met on 11 May 2016 to review the draft Proposed Submission Local Plan. Appendix C contains a list of infrastructure that the Council considers to be necessary to deliver development contained in the Local Plan. This does not include allocations for new A3 northbound and southbound slip roads at A247 Clandon Road. Allocation SRN9 is for ‘A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme’, a completely unrelated scheme.

The first reference to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road appears in Appendix C of the draft Local Plan considered by the Full Council on 24 May 2016. Although this significant change is not included within the published schedule of changes, the proposed slip roads are included in Appendix C under references SRN10 and SRN11.

The 6 June 2016 consultation version of the Proposed Submission Local Plan includes the proposed slip roads in Appendix C as follows:

SRN9 - A3 northbound on-slip at A247 Clandon Road  
SRN10 - A3 southbound off-slip at A247 Clandon Road

Send Parish Council are seriously concerned by the very late allocation of such significant pieces of road infrastructure. It appears that even on 11 May 2016, less than a month before the document was published for consultation, the proposed slip roads were not considered to be necessary to support the proposed site allocations. It appears that allocations SRN9 and SRN10 were added in response to the very late change of allocation A43 in Send and have not been given proper consideration.

Send Parish Council object in the strongest possible terms to allocations SRN9 and SRN10. Paragraph 182 of the NPPF explicitly states that in order for a plan to be considered sound, it must be ‘the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence’. It is clear from the chronology of the allocations set out above that these allocations have been added to the plan at the latest possible opportunity and at the final round of consultation. In order for the plan to be positively prepared, allocations of this scale should have been considered and made available for public comment far earlier in the consultation process. The following paragraphs set out how the supporting evidence base does not demonstrate how these proposed allocations have been carefully considered as part of an appropriate strategy based on proportionate evidence.

Evidence Base

The June 2016 Proposed Submission Local Plan is supported by three key documents setting out the transport evidence base. These are:

1. June 2016 Guildford Borough Transport Strategy
2. June 2016 Topic Paper - Transport
3. June 2016 Strategic Highways Assessment

The June 2016 Guildford Borough Transport Strategy sets out transport proposals to be delivered in accordance with the needs of transport providers, funders and the Council’s own transport evidence base. Proposals SRN9 and SRN10 are included as ‘anticipated improvements’ on page 10 and the indicative programme on page 22. No additional background to these schemes is provided.

The June 2016 Transport Topic Paper sets how the transport strategy was developed. SRN9 and SRN10 are included in a list of transport schemes at Appendix 3. In reference to SRN9 and SRN10 Paragraph 5.52 states ‘these junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange’. No additional background information is provided.

The June 2016 Strategic Highways Assessment is a strategic transport modelling study that informs decision making surrounding the suitability of potential development sites and future highway mitigation proposals which have been identified. Appendix A sets out the strategic residential sites assessed as part of the highways assessment. The main residential site in Send is as follows:
Ref. 2258 - Land south east of London Road Land south east of London Road, Send (part of B13-d) (known as Burnt Common)? 260 homes and 140 flats.

It is unclear which site this refers to. Site 2258 appears to be a reference to the Feb 2016 LAA site reference for the ‘Land at Garlick's Arch’, however the site description appears to refer to the Land around Burnt Common Warehouse, formerly allocated as Site A43. The B13-d reference appears to relate to the January 2013 Green Belt and Countryside Review area around Burnt Common, not Garlick's Arch, which falls under land parcel B14 in this document. This shows a high degree of inconsistency in the appraisal and it is unclear which site is even appraised. It is possible that this was changed shortly before the Local Plan was released for consultation with the updated A43 and A43a allocations in May 2016, but it indicates that this piece of evidence is inconsistent and should be ascribed little weight.

In addition to these three evidence base documents, the June 2016 Draft Infrastructure Delivery Plan provides detail on the infrastructure needed to support development included in the Proposed Submission Local Plan 2016. This document includes a repeat of the Infrastructure Schedule included in Appendix 2 of the June 2016 Proposed Submission Local Plan but provides no additional assessment of the justification or potential impact of proposals SRN9 and SRN10.

Overall there is very little evidence available to the public explaining why the new A3 northbound and southbound slip roads at A247 Clandon Road are necessary or justified. It is suggested that SRN9 and SRN10 are necessary in order to mitigate traffic flows from allocation A35 at Wisley Airfield, however it is not at all clear why a development 4km to the north east of Send with an existing junction to the A3 from Portsmouth Road and the B2039 directly to the west of the site requires a new junction at Send. Wisley Airfield was considered for allocation in the October 2013 Issues and Options Local Plan and allocated in the July 2014 Draft Local Plan for 2,100 homes. New slip roads at Send were not considered to be necessary to support this allocation in July 2014 and the allocation for Wisley Airfield is for an identical number of homes in the June 2016 Proposed Submission Local Plan. It is therefore clear that allocations SRN9 and SRN10 are not required to support allocation A35 at Wisley Airfield.

Until the most recent versions of the Proposed Submission Local Plan, allocation A43 Land around Burnt Common Warehouse, was allocated for up to 7,000 sqm of B1c/B2/B8 employment uses. This allocation was not considered to require a new junction to the A3 despite being allocated for an identical level of employment provision as Garlick’s Arch. Policy E1 of the June 2016 Proposed Submission Local Plan states that when developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common, will be treated as a Strategic Employment Site (allocation A43). The Parish notes that in the draft of the Proposed Submission Local Plan, reviewed by the Council’s Executive Committee on 11 May 2016, Policy E2 states that the new employment site at Burnt Common will be treated as a Strategic Employment Site. The Council has therefore recognised that both sites could be considered to be Strategic Employment Sites and that the Burnt Common Warehouse Strategic Employment Site allocation would not require a new junction to be considered acceptable. This adds further weight to the argument that the new junction works are not necessary and have not been carefully considered.

The chronology of site allocations appears to indicate that allocations SRN9 and SRN10 have been added at the same time as the A43 and A43a allocations in May 2016. We have set out in the following section why Allocation A43 and A43a are unsound and wholly unjustified, but independently of this Send Parish Council object to the proposed new A3 / A247 slip roads ref. SRN9 and SRN10 on the grounds that there is no indication that they have been justified by the evidence available and that the allocations are unsound on the basis that they have not been positively prepared and are not based upon a strategy which seeks to meet objectively assessed development and infrastructure requirements.

Proposed Changes to Make the Local Plan Sound

Remove allocations SRN9 and SRN10.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strategic Road Network Infrastructure Allocations SRN9 and SRN10

Background

Send Parish Council object to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road, to be delivered on the land covered by allocation A43a. A review of previous iterations of the Local Plan and the associated evidence base shows that these draft allocations have been made very recently and have not been properly appraised.

The July 2013 Infrastructure Baseline study considered the quality and capacity of the existing infrastructure in the Borough and was used to inform the more detailed infrastructure and transport strategies developed throughout the Local Plan process. Chapter 2 of this document identified the A3 as the key Strategic Road Network (SRN) in the Borough and recognised that the form and standard of the A3 through the borough was deficient in quality and capacity, resulting in congestion and unreliable journey times. This baseline has been used to influence the allocation of sites and how infrastructure could be upgraded.

Local Plan Transport Infrastructure Allocations

The various iterations of the draft Local Plan from October 2013 through to June 2016 set out the following approaches to transport infrastructure in the Borough.

The October 2013 Issues and Options Local Plan recognises the need to balance development with traffic congestion and minimise the impact of traffic on local communities. The document also recognises the need to focus new development that will generate significant movement in locations where the need to travel will be minimised and the use of sustainable transport modes can be maximised. This document does not set out specific allocations for transport infrastructure.

The July 2014 Draft Local Plan contained more detailed policy relating to transport and infrastructure. Policy 17 states that the key infrastructure needed to support plan delivery is provided in the infrastructure schedule at Appendix B. This schedule makes no reference to any requirement for a new junction at the A247. This version of the Local Plan allocates 431 homes in Send and Send Marsh / Burnt Common.

The Guildford Borough, Economy and Executive Advisory Board met on 13 April 2016 to discuss the draft version of the Proposed Submission Local Plan. The supporting briefing note states that delivery of the development contained within the Proposed Submission Local Plan is dependent on the delivery of the necessary infrastructure. The infrastructure schemes that the Council considered to be necessary for the delivery of the Proposed Submission Local Plan were included in Appendix C. Allocations SRN9 or SRN10 are not included in the schedule and no other references were made to the need for these schemes.

The Guildford Council Executive met on 11 May 2016 to review the draft Proposed Submission Local Plan. Appendix C contains a list of infrastructure that the Council considered to be necessary for delivery contained in the Local Plan. This does not include allocations for new A3 northbound and southbound slip roads at A247 Clandon Road. Allocation SRN9 is for ‘A3 southbound off-slip lane widening to A320 Stoke Interchange improvement scheme’, a completely unrelated scheme.

The first reference to the proposed new A3 northbound and southbound slip roads at A247 Clandon Road appears in Appendix C of the draft Local Plan considered by the Full Council on 24 May 2016. Although this significant change is not included within the published schedule of changes, the proposed slip roads are included in Appendix C under references SRN10 and SRN11.

The 6 June 2016 consultation version of the Proposed Submission Local Plan includes the proposed slip roads in Appendix C as follows:
Send Parish Council are seriously concerned by the very late allocation of such significant pieces of road infrastructure. It appears that even on 11 May 2016, less than a month before the document was published for consultation, the proposed slip roads were not considered to be necessary to support the proposed site allocations. It appears that allocations SRN9 and SRN10 were added in response to the very late change of allocation A43 in Send and have not been given proper consideration.

Send Parish Council object in the strongest possible terms to allocations SRN9 and SRN10. Paragraph 182 of the NPPF explicitly states that in order for a plan to be considered sound, it must be ‘the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence’. It is clear from the chronology of the allocations set out above that these allocations have been added to the plan at the latest possible opportunity and at the final round of consultation. In order for the plan to be positively prepared, allocations of this scale should have been considered and made available for public comment far earlier in the consultation process. The following paragraphs set out how the supporting evidence base does not demonstrate how these proposed allocations have been carefully considered as part of an appropriate strategy based on proportionate evidence.

Evidence Base

The June 2016 Proposed Submission Local Plan is supported by three key documents setting out the transport evidence base. These are:

1. June 2016 Guildford Borough Transport Strategy
2. June 2016 Topic Paper - Transport
3. June 2016 Strategic Highways Assessment

The June 2016 Guildford Borough Transport Strategy sets out transport proposals to be delivered in accordance with the needs of transport providers, funders and the Council’s own transport evidence base. Proposals SRN9 and SRN10 are included as ‘anticipated improvements’ on page 10 and the indicative programme on page 22. No additional background to these schemes is provided.

The June 2016 Transport Topic Paper sets how the transport strategy was developed. SRN9 and SRN10 are included in a list of transport schemes at Appendix 3. In reference to SRN9 and SRN10 Paragraph 5.52 states ‘these junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site allocation Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange’. No additional background information is provided.

The June 2016 Strategic Highways Assessment is a strategic transport modelling study that informs decision making surrounding the suitability of potential development sites and future highway mitigation proposals which have been identified. Appendix A sets out the strategic residential sites assessed as part of the highways assessment. The main residential site in Send is as follows:

Ref. 2258 - Land south east of London Road Land south east of London Road, Send (part of B13-d) (known as Burnt Common)? 260 homes and 140 flats.

It is unclear which site this refers to. Site 2258 appears to be a reference to the Feb 2016 LAA site reference for the ‘Land at Garlick's Arch’, however the site description appears to refer to the Land around Burnt Common Warehouse, formerly allocated as Site A43. The B13-d reference appears to relate to the January 2013 Green Belt and Countryside Review area around Burnt Common, not Garlick’s Arch, which falls under land parcel B14 in this document. This shows a high degree of inconsistency in the appraisal and it is unclear which site is even appraised. It is possible that this was changed shortly before the Local Plan was released for consultation with the updated A43 and A43a allocations in May 2016, but it indicates that this piece of evidence is inconsistent and should be ascribed little weight.
In addition to these three evidence base documents, the June 2016 Draft Infrastructure Delivery Plan provides detail on the infrastructure needed to support development included in the Proposed Submission Local Plan 2016. This document includes a repeat of the Infrastructure Schedule included in Appendix 2 of the June 2016 Proposed Submission Local Plan but provides no additional assessment of the justification or potential impact of proposals SRN9 and SRN10.

Overall there is very little evidence available to the public explaining why the new A3 northbound and southbound slip roads at A247 Clandon Road are necessary or justified. It is suggested that SRN9 and SRN10 are necessary in order to mitigate traffic flows from allocation A35 at Wisley Airfield, however it is not at all clear why a development 4km to the north east of Send with an existing junction to the A3 from Portsmouth Road and the B2039 directly to the west of the site requires a new junction at Send. Wisley Airfield was considered for allocation in the October 2013 Issues and Options Local Plan and allocated in the July 2014 Draft Local Plan for 2,100 homes. New slip roads at Send were not considered to be necessary to support this allocation in July 2014 and the allocation for Wisley Airfield is for an identical number of homes in the June 2016 Proposed Submission Local Plan. It is therefore clear that allocations SRN9 and SRN10 are not required to support allocation A35 at Wisley Airfield.

Until the most recent versions of the Proposed Submission Local Plan, allocation A43 Land around Burnt Common Warehouse, was allocated for up to 7,000 sqm of B1c/B2/B8 employment uses. This allocation was not considered to require a new junction to the A3 despite being allocated for an identical level of employment provision as Garlick’s Arch. Policy E1 of the June 2016 Proposed Submission Local Plan states that when developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common, will be treated as a Strategic Employment Site (allocation A43). The Parish notes that in the draft of the Proposed Submission Local Plan, reviewed by the Council’s Executive Committee on 11 May 2016, Policy E2 states that the new employment site at Burnt Common will be treated as a Strategic Employment Site. The Council has therefore recognised that both sites could be considered to be Strategic Employment Sites and that the Burnt Common Warehouse Strategic Employment Site allocation would not require a new junction to be considered acceptable. This adds further weight to the argument that the new junction works are not necessary and have not been carefully considered.

The chronology of site allocations appears to indicate that allocations SRN9 and SRN10 have been added at the same time as the A43 and A43a allocations in May 2016. We have set out in the following section why Allocation A43 and A43a are unsound and wholly unjustified, but independently of this Send Parish Council object to the proposed new A3 / A247 slip roads ref. SRN9 and SRN10 on the grounds that there is no indication that they have been justified by the evidence available and that the allocations are unsound on the basis that they have not been positively prepared and are not based upon a strategy which seeks to meet objectively assessed development and infrastructure requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Tibbalds Planning and Urban Design is the appointed planning consultant acting on behalf of Send Parish Council. These representations relate to the June 2016 consultation of the Proposed Submission version of the Local Plan: Strategy and Sites document, which is open for consultation until Monday 18 July.

This supporting statement challenges the overall level of proposed housing provision in the Borough, focusing specifically on draft housing, employment and transport allocations in Send, Send Marsh and Burntcommon. This statement sets out objections to the following allocations:

- Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes
- Site A43 – Land at Garlick’s Arch – employment and 400 homes
- Site A43a – Land for new north and south facing slip roads to/from A3 at Send Marsh / Burnt Common
- Site A44 – Land West of Winds Ridge – 40 homes and 2 traveller pitches
- SRN9 A3 northbound on-slip at A247 Clandon Road
- SRN10 A3 southbound off-slip at A247 Clandon Road

Send Parish Council also request that the Local Plan provides the opportunity for sites in inset villages to be allocated through the neighbourhood plan process, allowing local communities to identify and allocate the most appropriate sites for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPS16/7877</td>
<td>15667489 / Tibbalds (Jon Herbert)</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed Allocations for Housing Provision

Send Parish Council consider the proposed level of housing provision to be unsound due to the number of allocated homes being significantly greater than the identified need. Whilst Send Parish support an approach to housing delivery that meets the objectively assessed need in the Borough, the allocations set out in the June 2016 Proposed Submission Local Plan represent over-development. The following section demonstrates that sufficient justification has not been provided for the levels of residential development proposed.

The West Surrey Strategic Housing Market Area is comprised of Guildford, Waverley and Woking Boroughs. The September 2015 West Surrey Strategic Housing Market Assessment (SHMA) identifies a need for 693 Dwellings Per Annum (DPA) in Guildford. Policy S2: Borough Wide Strategy, of the Proposed Submission Local Plan expects a total of 10,395 homes to be delivered between 2018 and 2033. This results in an average of 693 DPA in accordance with the SHMA.

Table 1 of Policy S2 sets out the planned delivery of housing between 2018 and 2033. Sufficient allocations are made to deliver 13,652 homes in this period; an average of 910 DPA, or 131% of the requirement identified in the SHMA. Paragraph 4.1.12 of the Proposed Submission Local Plan acknowledges that the number of homes set out in table 1 is greater than the number of homes required by policy S2 and that this is deliberate in order to build in flexibility.
The Guildford Borough Economy and Infrastructure Executive Advisory Board met on 13 April 2016 to review the draft Local Plan before it was released for consultation. Concern was raised regarding the over provision of land allocated in the Proposed Submission Local Plan when compared to the Objectively Assessed Need (OAN) figure. The Leader of the Council confirmed that this was required to ensure that the Council could meet the OAN by enabling Guildford Borough Council to have flexibility, however no justification was provided for the significant over provision.

No evidence is presented to justify allocating sites to provide 131% of the objectively assessed need. Whilst some allocated sites will inevitably not be brought forward, sites should only be allocated if they are genuinely considered to be deliverable. If the Council has evidence to suggest that approximately a quarter of the allocated sites are undeliverable then this calls for a serious re-appraisal of the proposed allocations. The Parish Council consider an approach to allocation in line with national policy to be more appropriate.

The March 2012 National Planning Policy Framework (NPPF) paragraph 47 clearly sets out the requirements for Local Planning Authorities to deliver housing through the Local Plan process. Councils should use the evidence base to ensure that the full OAN for the housing market area is met. This is recognised as 693 DPA.

NPPF Paragraph 47 requires that planning authorities demonstrate on an annual basis that there is a sufficient supply of land for five years’ worth of housing, with an additional buffer of 5%. This can be increased to a 20% buffer where there is persistent under delivery of housing. This gives a strong indication of the level of provision that the Council should be planning for and a buffer of 5% to 20% would be considered to be a far more appropriate level of flexibility. Based upon the requirement for 693 DPA, this would necessitate between 727 DPA and 832 DPA (as compared to 910 DPA provided for in the draft Local Plan), or sufficient allocations for between 10,915 and 12,474 homes. This suggests that there is currently a proposed over-allocation of between 1,178 and 2,737 homes throughout the plan period.

Send Parish are concerned that this has resulted in the allocation of sites that are not suitable for development. Sections three, four and five of this statement addresses this point further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Parish is very concerned that additional development will exacerbate the existing traffic congestion in the village. The cumulative impact of proposed allocation A44, Send Business Centre and unimplemented planning permission 14/P/02289 for a new marina to the north of Tannery Lane could introduce significant levels of new traffic to the surrounding streets.

Tannery Lane is narrow, making it very difficult for vehicles to pass along the entire length, especially for larger commercial vehicles. This often results in vehicles needing to reverse to find a suitable passing place. Currently short-term parking occurs along Tannery Lane and Send Road, which can lead to reductions in visibility for drivers emerging from the side road. Tannery Lane narrows towards the northern end and the 400m stretch before the junction with Polesden Lane is c.2.75m wide. The road cannot be widened due to the adjacent nature reserve.

Tannery Lane also provides poor pedestrian access. There is a short section of pavement on the southern side of the lane, running approximately 100m north east of Send Road. The remainder of Tannery Lane has no provision for pedestrians, with few opportunities for improvement due to the narrow carriageway.

Although Environment Agency flood maps include the site in flood zone 1, the land currently floods, despite recent improvements to drainage. Send Parish therefore urge the Council to re-consider this proposed allocation in light of traffic and flooding issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7880</th>
<th>Respondent:</th>
<th>15667489 / Tibbalds (Jon Herbert)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
</tbody>
</table>
Tannery Lane also provides poor pedestrian access. There is a short section of pavement on the southern side of the lane, running approximately 100m north east of Send Road. The remainder of Tannery Lane has no provision for pedestrians, with few opportunities for improvement due to the narrow carriageway.

Although Environment Agency flood maps include the site in flood zone 1, the land currently floods, despite recent improvements to drainage. Send Parish therefore urge the Council to re-consider this proposed allocation in light of traffic and flooding issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7736</th>
<th>Respondent:</th>
<th>15667489 / Tibbalds (Jon Herbert)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Send Parish Council object to allocation A43 on the grounds that it is not justified. The site is allocated for 400 C3 residential units and up to 7,000 sq m of B1c/B2/B8 employment use, however this major allocation has only been included in the most recent versions of the draft Local Plan and is not supported by the evidence base.

The July 2014 Draft Local Plan allocated three sites in Send, Send Marsh / Burnt Common for whole or partial development for residential purposes. These sites are as follows:

- Site 74 - Land around Burnt Common warehouse, London Road, Send - B employment uses and up to 100 homes
- Site 75 - Land at Tannery Lane, Send (including Clockbarn Nurseries) - 215 homes
- Site 76 - Land to east of Aldertons Farm, Send Marsh - 116 homes

This 2014 version of the Local Plan allocated a total of 431 homes in Send and Send Marsh / Burnt Common. This is compared to 185 homes allocated in the initial draft of the Proposed Submission Local Plan (dated May 2016) before allocation A43 was changed. This clearly indicates that following the 2014 consultation it was recognised that 431 homes in Send was over development. The reduction to 185 reflects a more appropriate level of development. The last minute change to 485 homes in the most recent version of the Proposed Submission Local Plan represents a significant increase that is clearly unjustified by the evidence base.

After consulting on the Local Plan in July 2014, the Council drafted an updated version of the Local Plan for review by the Council before being published for consultation in June 2016. This version of the draft Local Plan was considered by the Economy and Infrastructure Executive Advisory Board (The ‘Board’) on 13 April 2016 and included the following allocations for Send, Send Marsh and Burnt Common. The Board did not raise any concerns or propose any changes to these allocations:

- Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes
- Site A43 – Land around Burnt Common Warehouse, London Road, Send – 100 homes with B employment uses
- Site A44 – Land West of Winds Ridge – 40 homes
Send Parish Council has previously raised concerns about the suitability of these sites due to the lack of capacity on narrow local roads, but consider an allocation of 185 homes to represent a more appropriate level of development than the 485 now included with the draft Submission Local Plan. The Parish may wish to have the opportunity to allocate appropriate sites through the neighbourhood plan process.

The Guildford Council Executive met on 11 May 2016 to review the draft Proposed Submission Local Plan before it was published for consultation. The draft version of the Plan included the same allocations as were reviewed on 13 April 2016, however as a result of this meeting the decision was made to remove from the draft Local Plan site allocation policy A43 Land around Burnt Common Warehouse and replace it with a new site known as Garlick’s Arch, with proposals for 400 homes and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) uses. The justification for this change is provided as ‘the Interim Director of Development be authorised, in consultation with the Leader of the Council, to make such minor alterations to improve the clarity of the document as he shall deem appropriate’.

The reasons for this last minute change in allocation are wholly unjustified. Firstly, it is unreasonable to consider the proposed changes to be ‘minor’ considering they involve allocating a further 300 homes to a village with a population of only 1,931 and delete the previous allocation around Burnt Common Warehouse that has been carefully considered, consulted upon and adapted since the first iteration of the Local Plan Issues and Options Paper in October 2013. This is a wholly inappropriate approach to the Local Plan making process and represents bad practice.

At no point up to May 2016 had any allocation been made relating to the Garlick’s Arch site. It had been included in the February 2016 Land Availability Assessment ref. 2258, but had not been allocated. Since the site was only identified as a potentially developable site in February 2016 and was not included in drafts of the Proposed Submission Local Plan as late as May 2016, this indicates that insufficient consideration has been given to its allocation.

Section 21 of the January 2013 Green Belt and Countryside Study examined how Green Belt Boundaries could be re-defined around Send Marsh and Burnt Common to accommodate a major settlement expansion. This study includes the land at Garlick’s Arch as plot B14-A. The appraisal recognises that Send Marsh and Burnt Common lack community facilities and would require a significant population increase far beyond what is currently proposed in order to create a ‘critical mass’ of population. This indicates that the current proposal for 400 new homes on the Garlick’s Arch site would introduce homes to a settlement with few facilities, requiring new residents to travel to other settlements for work, shopping and leisure. Indeed, Sustainability Appraisal of the draft Submission Local Plan, in Appendix IV Site Options, appraises all sites considered potentially suitable for allocating in the Local Plan. A traffic light approach is used to appraise individual sites. Allocation A43, Garlick’s Arch, is considered to be the poorest performing of the sites considered potentially suitable in Send, Send Marsh and Burnt Common, with red traffic lights against the following criteria: SNCI/LNR; key employment site; flood risk; recreation facility; town/district/local centre or shop; primary school; secondary school; high quality agricultural land; previously developed land; and railway station. In fact, the Sustainability Appraisal considers it to be one of the poorest performing of all sites considered to have potential.

Send Parish Council consider the Land around Burnt Common Warehouse to be a more appropriate allocation that has been given the necessary consideration through the Local Plan consultation process. Despite the late changes outlined above, the Key Diagram contained within the proposed Submission Local Plan (page 18) indicates that land around Burnt Common Warehouse is identified as a Strategic Employment Site rather than that at Garlick’s Arch. The draft Proposed Submission Local Plan was reviewed by the Guildford Borough Executive Committee. The supporting papers for this meetings stated:

“Send Marsh/Burnt Common – this site is located in a yellow (medium) sensitivity land parcel. Our Employment Land Needs Assessment identifies a need for industrial land and this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need”.

No evidence is provided to explain how circumstances changed in the following month before the Local Plan was published for consolation to justify the change in allocation. It would appear from the meeting minutes that this change was only made to accommodate additional housing and a new slip road to the A3, but as this statement demonstrates in sections two, three and four, these changes are unsustainable, unjustified and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** PSLPS16/7878  **Respondent:** 15667489 / Tibbalds (Jon Herbert)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Send Parish Council object to allocation A43 on the grounds that it is not justified. The site is allocated for 400 C3 residential units and up to 7,000 sq m of B1c/B2/B8 employment use, however this major allocation has only been included in the most recent versions of the draft Local Plan and is not supported by the evidence base.

The July 2014 Draft Local Plan allocated three sites in Send, Send Marsh / Burnt Common for whole or partial development for residential purposes. These sites are as follows:

Site 74 - Land around Burnt Common warehouse, London Road, Send - B employment uses and up to 100 homes
Site 75 - Land at Tannery Lane, Send (including Clockbarn Nurseries) - 215 homes
Site 76 - Land to east of Aldertons Farm, Send Marsh - 116 homes

This 2014 version of the Local Plan allocated a total of 431 homes in Send and Send Marsh / Burnt Common. This is compared to 185 homes allocated in the initial draft of the Proposed Submission Local Plan (dated May 2016) before allocation A43 was changed. This clearly indicates that following the 2014 consultation it was recognised that 431 homes in Send was over development. The reduction to 185 reflects a more appropriate level of development. The last minute change to 485 homes in the most recent version of the Proposed Submission Local Plan represents a significant increase that is clearly unjustified by the evidence base.

After consulting on the Local Plan in July 2014, the Council drafted an updated version of the Local Plan for review by the Council before being published for consultation in June 2016. This version of the draft Local Plan was considered by the Economy and Infrastructure Executive Advisory Board (The ‘Board’) on 13 April 2016 and included the following allocations for Send, Send Marsh and Burnt Common. The Board did not raise any concerns or propose any changes to these allocations:

Site A42 â€“ Clockbarn Nursery, Tannery Lane, Send â€“ 45 homes
Site A43 â€“ Land around Burnt Common Warehouse, London Road, Send â€“ 100 homes with B employment uses
Site A44 â€“ Land West of Winds Ridge â€“ 40 homes

Send Parish Council has previously raised concerns about the suitability of these sites due to the lack of capacity on narrow local roads, but consider an allocation of 185 homes to represent a more appropriate level of development than the 485 now included with the draft Submission Local Plan. The Parish may wish to have the opportunity to allocate appropriate sites through the neighbourhood plan process.

The Guildford Council Executive met on 11 May 2016 to review the draft Proposed Submission Local Plan before it was published for consultation. The draft version of the Plan included the same allocations as were reviewed on 13 April 2016, however as a result of this meeting the decision was made to remove from the draft Local Plan site allocation policy A43 Land around Burnt Common Warehouse and replace it with a new site known as Garlick’s Arch, with proposals for 400 homes.
homes and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) uses. The justification for this change is provided as ‘the Interim Director of Development be authorised, in consultation with the Leader of the Council, to make such minor alterations to improve the clarity of the document as he shall deem appropriate’.

The reasons for this last minute change in allocation are wholly unjustified. Firstly, it is unreasonable to consider the proposed changes to be ‘minor’ considering they involve allocating a further 300 homes to a village with a population of only 1,931 and delete the previous allocation around Burnt Common Warehouse that has been carefully considered, consulted upon and adapted since the first iteration of the Local Plan Issues and Options Paper in October 2013. This is a wholly inappropriate approach to the Local Plan making process and represents bad practice.

At no point up to May 2016 had any allocation been made relating to the Garlick’s Arch site. It had been included in the February 2016 Land Availability Assessment ref. 2258, but had not been allocated. Since the site was only identified as a potentially developable site in February 2016 and was not included in drafts of the Proposed Submission Local Plan as late as May 2016, this indicates that insufficient consideration has been given to its allocation.

Section 21 of the January 2013 Green Belt and Countryside Study examined how Green Belt Boundaries could be re-defined around Send Marsh and Burnt Common to accommodate a major settlement expansion. This study includes the land at Garlick’s Arch as plot B14-A. The appraisal recognises that Send Marsh and Burnt Common lack community facilities and would require a significant population increase far beyond what is currently proposed in order to create a ‘critical mass’ of population. This indicates that the current proposal for 400 new homes on the Garlick’s Arch site would introduce homes to a settlement with few facilities, requiring new residents to travel to other settlements for work, shopping and leisure. Indeed, Sustainability Appraisal of the draft Submission Local Plan, in Appendix IV Site Options, appraises all sites considered potentially suitable for allocating in the Local Plan. A traffic light approach is used to appraise individual sites. Allocation A43, Garlick’s Arch, is considered to be the poorest performing of the sites considered potentially suitable in Send, Send Marsh and Burnt Common, with red traffic lights against the following criteria: SNCI/LNR; key employment site; flood risk; recreation facility; town/district/local centre or shop; primary school; secondary school; high quality agricultural land; previously developed land; and railway station. In fact, the Sustainability Appraisal considers it to be one of the poorest performing of all sites considered to have potential.

Send Parish Council consider the Land around Burnt Common Warehouse to be a more appropriate allocation that has been given the necessary consideration through the Local Plan consultation process. Despite the late changes outlined above, the Key Diagram contained within the proposed Submission Local Plan (page 18) indicates that land around Burnt Common Warehouse is identified as a Strategic Employment Site rather than that at Garlick’s Arch. The draft Proposed Submission Local Plan was reviewed by the Guildford Borough Executive Committee. The supporting papers for this meetings stated:

“Send Marsh/Burnt Common – this site is located in a yellow (medium) sensitivity land parcel. Our Employment Land Needs Assessment identifies a need for industrial land and this site is the only suitable and deliverable site identified by the Green Belt and Countryside Study that could meet this need”.

No evidence is provided to explain how circumstances changed in the following month before the Local Plan was published for consolation to justify the change in allocation. It would appear from the meeting minutes that this change was only made to accommodate additional housing and a new slip road to the A3, but as this statement demonstrates in sections two, three and four, these changes are unsustainable, unjustified and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7879</th>
<th>Respondent:</th>
<th>15667489 / Tibbalds (Jon Herbert)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send Parish Council object to allocation A43 on the grounds that it is not justified. The site is allocated for 400 C3 residential units and up to 7,000 sq m of B1c/B2/B8 employment use, however this major allocation has only been included in the most recent versions of the draft Local Plan and is not supported by the evidence base.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7735   Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A43a is to be occupied by infrastructure allocations SRN9 and SRN10. Section four of this report details why the new slip roads are unjustified and should be considered to be unsound. On this basis allocation A43a which is specifically allocated to build the slip roads should be removed for the same reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7738   Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site is allocated for 40 homes and 2 traveller pitches. The Parish is concerned about the proposed access arrangements since Send Hill is a very narrow road; two cars have difficulty passing one another in places. An additional 40 homes would significantly increase the chances of two cars meeting, resulting in congestion and access issues with little scope to widen the road. This site is over 1km from the shops and the nearest bus stops in the centre of Send. Send Hill does not have any pavements for the majority of its length and would be difficult to walk along, especially for those with push chairs or mobility problems. The Parish Council are also concerned about the impact that increased traffic on Send Hill will have
on the adjacent multi-denominational cemetery. This site is used by local people as a quiet place for contemplation. Resident’s enjoyment will be diminished by an increase in passing traffic, especially during construction.

Send Parish Council question whether the proposed allocation for two traveller pitches is appropriate in light of the Council’s evidence base. The most recent Traveller Accommodation Assessment is from June 2012. This identifies the number of pitches that are needed within the borough and is listed under the evidence base for the June 2016 Proposed Submission Local Plan. The 2012 assessment appears to have been used as a basis for current draft policies and the 2016 Land Availability Assessment.

The government’s most recent policy for traveller sites was published in August 2015 and sets out the best approaches for planning for traveller sites. Since the Borough’s current Traveller Accommodation Assessment was published significantly before the 2015 guidance, it should be considered out of date. The dated nature of the 2012 assessment is recognised in the June 2016 Sustainability Appraisal, which states on page 94 that the Council have decided to over-allocate traveller sites in light of the dated evidence base.

The Parish Council consider this approach to be unsound and therefore request that the evidence base for the total number of traveller pitches required is re-visited to ensure that it is up to date.

Neighbourhood Plans

The Local Plan should provide the opportunity for sites in inset villages to be allocated through the neighbourhood plan process, allowing local communities to identify and allocate the most appropriate sites for development in accordance with neighbourhood planning principles and general conformity with strategic policy.

Proposed Changes to Make the Local Plan Sound

Remove allocations A43 Garlick’s Arch and A43a Slip roads.

Reinstate allocation A43 Land around Burnt Common Warehouse, as set out in drafts of the Proposed Submission Local Plan reviewed by the Borough, Economy and Infrastructure Executive Advisory Board on 13 April 2016.

Remove allocations A42 and A44 in order to allow the Parish Council the opportunity to allocate suitable alternative sites through the Local Plan process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7881  Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site is allocated for 40 homes and 2 traveller pitches. The Parish is concerned about the proposed access arrangements since Send Hill is a very narrow road; two cars have difficulty passing one another in places. An additional 40 homes would significantly increase the chances of two cars meeting, resulting in congestion and access issues with little scope to widen the road. This site is over 1km from the shops and the nearest bus stops in the centre of Send. Send Hill does not have any pavements for the majority of its length and would be difficult to walk along, especially for those with push chairs or mobility problems. The Parish Council are also concerned about the impact that increased traffic on Send Hill will have
on the adjacent multi-denominational cemetery. This site is used by local people as a quiet place for contemplation. Resident’s enjoyment will be diminished by an increase in passing traffic, especially during construction.

Send Parish Council question whether the proposed allocation for two traveller pitches is appropriate in light of the Council’s evidence base. The most recent Traveller Accommodation Assessment is from June 2012. This identifies the number of pitches that are needed within the borough and is listed under the evidence base for the June 2016 Proposed Submission Local Plan. The 2012 assessment appears to have been used as a basis for current draft policies and the 2016 Land Availability Assessment.

The government’s most recent policy for traveller sites was published in August 2015 and sets out the best approaches for planning for traveller sites. Since the Borough’s current Traveller Accommodation Assessment was published significantly before the 2015 guidance, it should be considered out of date. The dated nature of the 2012 assessment is recognised in the June 2016 Sustainability Appraisal, which states on page 94 that the Council have decided to over-allocate traveller sites in light of the dated evidence base.

The Parish Council consider this approach to be unsound and therefore request that the evidence base for the total number of traveller pitches required is re-visited to ensure that it is up to date.

Neighbourhood Plans

The Local Plan should provide the opportunity for sites in inset villages to be allocated through the neighbourhood plan process, allowing local communities to identify and allocate the most appropriate sites for development in accordance with neighbourhood planning principles and general conformity with strategic policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17144  Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4 of the Proposed Submission Local Plan sets out the approach to development in inset villages. The Inset villages were ‘washed over’ by Green belt allocations until recently and are still characterised as small settlements in rural areas. Send and Send Marsh / Burnt Common are already been subject to significant allocations that will fundamentally change the character of the settlements.

Para 4.3.12 of the Proposed Submission Local Plan notes that where villages are inset from the Green Belt, other development management policies should be used to restrict any inappropriate development. Policy D4 as phrased would allow proposals for development to come forward in addition to the site allocations identified in the Proposed Submission Local Plan.

Proposed changes to the Local Plan

The Parish Council request that Policy D4 is amended to defer to a neighbourhood plan where there is one in place, allowing this to establish sites for appropriate infill development in line with the general principles of strategic policy. Otherwise this policy could essentially override any sites identified by neighbourhood plans.
Policy D4 of the Proposed Submission Local Plan sets out the approach to development in inset villages. The Inset villages were ‘washed over’ by Green belt allocations until recently and are still characterised as small settlements in rural areas. Send and Send Marsh / Burnt Common are already been subject to significant allocations that will fundamentally change the character of the settlements.

Para 4.3.12 of the Proposed Submission Local Plan notes that where villages are inset from the Green Belt, other development management policies should be used to restrict any inappropriate development. Policy D4 as phrased would allow proposals for development to come forward in addition to the site allocations identified in the Proposed Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17143  Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Introduction

Tibbalds Planning and Urban Design is the appointed planning consultant acting on behalf of Send Parish Council. These representations relate to the June 2016 consultation of the Proposed Submission version of the Local Plan: Strategy and Sites document, which is open for consultation until Monday 18 July.

This supporting statement challenges the overall level of proposed housing provision in the Borough, focusing specifically on draft housing, employment and transport allocations in Send, Send Marsh and Burnt common. This statement sets out objections to the following allocations:
Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes
Site A43 – Land at Garlick’s Arch – employment and 400 homes
Site A43a – Land for new north and south facing slip roads to/from A3 at Send Marsh/ Burnt Common
Site A44 – Land West of Winds Ridge – 40 homes and 2 traveller pitches

SRN9 A3 northbound on-slip at A247 Clandon Road SRN10 A3 southbound off-slip at A247 Clandon Road

Send Parish Council also request that the Local Plan provides the opportunity for sites in inset villages to be allocated through the neighbourhood plan process, allowing local communities to identify and allocate the most appropriate sites for development.

Proposed Allocations for Housing Provision

Send Parish Council consider the proposed level of housing provision to be unsound due to the number of allocated homes being significantly greater than the identified need. Whilst Send Parish support an approach to housing delivery that meets the objectively assessed need in the Borough, the allocations set out in the June 2016 Proposed Submission Local Plan represent over-development. The following section demonstrates that sufficient justification has not been provided for the levels of residential development proposed.

The West Surrey Strategic Housing Market Area is comprised of Guildford, Waverley and Woking Boroughs. The September 2015 West Surrey Strategic Housing Market Assessment (SHMA) identifies a need for 693 Dwellings Per Annum (DPA) in Guildford. Policy S2: Borough Wide Strategy, of the Proposed Submission Local Plan expects a total of 10,395 homes to be delivered between 2018 and 2033. This results in an average of 693 DPA in accordance with the SHMA.

Table 1 of Policy S2 sets out the planned delivery of housing between 2018 and 2033. Sufficient allocations are made to deliver 13,652 homes in this period; an average of 910 DPA, or 131% of the requirement identified in the SHMA. Paragraph 4.1.12 of the Proposed Submission Local Plan acknowledges that the number of homes set out in table 1 is greater than the number of homes required by policy S2 and that this is deliberate in order to build in flexibility.

The Guildford Borough Economy and Infrastructure Executive Advisory Board met on 13 April 2016 to review the draft Local Plan before it was released for consultation. Concern was raised regarding the over provision of land allocated in the Proposed Submission Local Plan when compared to the Objectively Assessed Need (OAN) figure. The Leader of the Council confirmed that this was required to ensure that the Council could meet the OAN by enabling Guildford Borough Council to have flexibility, however no justification was provided for the significant over provision. No evidence is presented to justify allocating sites to provide 131% of the objectively assessed need. Whilst some allocated sites will inevitably not be brought forward, sites should only be allocated if they are genuinely considered to be deliverable. If the Council has evidence to suggest that approximately a quarter of the allocated sites are undeliverable then this calls for a serious re-appraisal of the proposed allocations. The Parish Council consider an approach to allocation in line with national policy to be more appropriate.

The March 2012 National Planning Policy Framework (NPPF) paragraph 47 clearly sets out the requirements for Local Planning Authorities to deliver housing through the Local Plan process. Councils should use the evidence base to ensure that the full OAN for the housing market area is met. This is recognised as 693 DPA.

NPPF Paragraph 47 requires that planning authorities demonstrate on an annual basis that there is a sufficient supply of land for five years’ worth of housing, with an additional buffer of 5%. This can be increased to a 20% buffer where there is persistent under delivery of housing. This gives a strong indication of the level of provision that the Council should be planning for and a buffer of 5% to 20% would be considered to be a far more appropriate level of flexibility. Based upon the requirement for 693 DPA, this would necessitate between 727 DPA and 832 DPA (as compared to 910 DPA provided for in the draft Local Plan), or sufficient allocations for between 10,915 and 12,474 homes. This suggests that there is currently a proposed over-allocation of between 1,178 and 2,737 homes throughout the plan period.

Send Parish are concerned that this has resulted in the allocation of sites that are not suitable for development. Sections three, four and five of this statement addresses this point further.
Distribution of Housing

Settlement Hierarchy

The May 2014 Settlement Hierarchy Document is identified as key evidence in the Proposed Submission Local Plan. This document divides the settlements in Guildford Borough into the following hierarchy in order to promote sustainable development:

1. Urban Area (Guildford)
2. Rural Service Centre x 1
3. Large Villages x 11
4. Medium Villages x 6
5. Small Villages x 6
6. Loose knit / hamlets x 13

Send, Send Marsh and Burnt Common are considered to be large villages, although chapter 4 recognises that Send Marsh / Burnt Common are only identified as a large village due to the proximity to Send’s services. Otherwise, Send Marsh / Burnt Common would be categorised as a medium village.

Paragraph 3.4.2 states that large rural villages are unsuitable for substantial growth but capable of accommodating an extension. Medium sized villages are unsuitable for substantial growth but capable of taking appropriate residential infill and development to meet local needs, defined as ‘employment, amenity and community facilities as well as small scale infill housing and rural exception sites for affordable housing’. Send Parish consider the proposed level of development in Send Marsh / Burnt Common to represent substantial and inappropriate growth, contrary to this strategy for development.

Section 3.2 and 3.3 of the May 2014 Settlement Hierarchy Document assesses the sustainability of each of the settlements in the Borough, taking into consideration community facilities, access to public transport and employment opportunities. This document recognises that Send has a population of 2,314 and Send Marsh / Burnt Common has a population of 1,931. The report sets out functional rankings for all settlement’s in the Borough; Send, Send Marsh and Burnt Common are scored as 15-40 for the community facilities, infrastructure and transport. For comparison, Shackleford, Shalford, Albury, Wanborough, Homsbury St Mary, Jacobs Well, Gomshall, Chilworth, Effingham, West Clandon and Peaslake all have higher functional rankings, indicating that the Send area is inappropriate for any significant levels of development due to the lack of social infrastructure. Development should be focused in the most sustainable locations available.

Paragraph 10.7.1 of the June 2016 Sustainability Appraisal recognises that ‘the proposed allocation at Send Marsh / Burnt Common (400 homes) potentially stands out as being some distance from a GP surgery’. The May 2014 Settlement Hierarchy Report also demonstrates that Send, Send Marsh and Burnt Common have relatively poor community facility provision, especially in regards to shops and public transport.

The Send Medical Centre is not served by local busses, making it particularly difficult for those with mobility problems to attend. The parking facilities at the village shops are limited and not suitable for disabled access. Send only has hourly bus services to Guildford, with poor evening and weekend services, indicating that new homes would be very dependent on cars. In light of the recognised congestion on the A3, residential development would be far better located in areas with good access to public transport and community facilities.

The June 2016 Proposed Submission Local Plan allocates three sites in Send and Send Marsh / Burnt Common:

Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes
Site A43 – Land at Garlick’s Arch – employment and 400 homes
Site A43a – Land for new north and south facing slip roads to/from A3 at Send Marsh / Burnt Common
Site A44 – Land West of Winds Ridge – 40 homes and 2 traveller pitches

The proposed allocation of site A43 for 400 homes would result in a population increase of 48% in Send Marsh / Burnt Common, assuming an average of 2.3 people per dwelling (this is based upon the average set out in the 2011 UK census). This represents an average population increase of 3.2% per annum across the plan period, significantly higher than ONS projections of 0.57% per annum for the UK for the same period.
For comparison, allocations A42 and A44 would result in a population increase of 8% in Send across the plan period, or 0.5% per annum. Whilst the Parish Council do not support draft allocations A42 and A44, they consider this population increase to represent a more organic rate of growth for a settlement of this size.

Send Parish object to the proposed level of residential allocations on the grounds that they do not represent sustainable development. Considering there is a demonstrable over-allocation of housing beyond what is required to meet the Borough’s objectively assessed needs, the number of allocated homes in Send Marsh / Burnt Common should be significantly reduced.

Sections four and five of this report address the allocations that the Parish consider to be inappropriate and unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17145  Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  
In summary, Send Parish consider the following changes to be necessary to make the Proposed Submission Local Plan sound:  
Remove transport infrastructure allocations SRN9 and SRN10;  
Remove allocations A43 Garlick’s Arch and A43a slip roads;  
Reinstate allocation A43 Land around Burnt Common Warehouse, as set out in drafts of the Proposed Submission Local Plan reviewed by the Borough, Economy and Infrastructure Executive Advisory Board on 13 April 2016;  
Remove allocations A42 and A44 in order to allow the Parish Council the opportunity to allocate suitable alternative sites through the Neighbourhood Plan process.  
Review the process that has been used to determine the number of traveller pitches required in light of out of date evidence base.  
Amend Policy D4 to provide scope for neighbourhood plans to identify appropriate sites and policies within the inset villages.  
Send Parish are pleased to have the opportunity to respond to the draft Local Plan and request that they are informed of any future consolation events.  
What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

Comment ID: PSLPP16/17346  Respondent: 15667489 / Tibbalds (Jon Herbert)  Agent:  

Page 1219 of 2988
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Distribution of Housing

Settlement Hierarchy

The May 2014 Settlement Hierarchy Document is identified as key evidence in the Proposed Submission Local Plan. This document divides the settlements in Guildford Borough into the following hierarchy in order to promote sustainable development:

1. Urban Area (Guildford)
2. Rural Service Centre x 1
3. Large Villages x 11
4. Medium Villages x 6
5. Small Villages x 6
6. Loose knit / hamlets x 13

Send, Send Marsh and Burnt Common are considered to be large villages, although chapter 4 recognises that Send Marsh / Burnt Common are only identified as a large village due to the proximity to Send’s services. Otherwise, Send Marsh / Burnt Common would be categorised as a medium village.

Paragraph 3.4.2 states that large rural villages are unsuitable for substantial growth but capable of accommodating an extension. Medium sized villages are unsuitable for substantial growth but capable of taking appropriate residential infill and development to meet local needs, defined as ‘employment, amenity and community facilities as well as small scale infill housing and rural exception sites for affordable housing’. Send Parish consider the proposed level of development in Send Marsh / Burnt Common to represent substantial and inappropriate growth, contrary to this strategy for development.

Section 3.2 and 3.3 of the May 2014 Settlement Hierarchy Document assesses the sustainability of each of the settlements in the Borough, taking into consideration community facilities, access to public transport and employment opportunities. This document recognises that Send has a population of 2,314 and Send Marsh / Burnt Common has a population of 1,931. The report sets out functional rankings for all settlement’s in the Borough; Send, Send Marsh and Burnt Common are scored as 15/40 for the community facilities, infrastructure and transport. For comparison, Shackleford, Shalford, Albury, Wanborough, Homsbury St Mary, Jacobs Well, Gomshall, Chilworth, Effingham, West Clandon and Peaslake all have higher functional rankings, indicating that the Send area is inappropriate for any significant levels of development due to the lack of social infrastructure. Development should be focused in the most sustainable locations available.

Paragraph 10.7.1 of the June 2016 Sustainability Appraisal recognises that ‘the proposed allocation at Send Marsh / Burnt Common (400 homes) potentially stands out as being some distance from a GP surgery’. The May 2014 Settlement Hierarchy Report also demonstrates that Send, Send Marsh and Burnt Common have relatively poor community facility provision, especially in regards to shops and public transport.

The Send Medical Centre is not served by local busses, making it particularly difficult for those with mobility problems to attend. The parking facilities at the village shops are limited and not suitable for disabled access. Send only has hourly bus services to Guildford, with poor evening and weekend services, indicating that new homes would be very dependent on cars. In light of the recognised congestion on the A3, residential development would be far better located in areas with good access to public transport and community facilities.

The June 2016 Proposed Submission Local Plan allocates three sites in Send and Send Marsh / Burnt Common:

- Site A42 – Clockbarn Nursery, Tannery Lane, Send – 45 homes
• Site A43 – Land at Garlick’s Arch – employment and 400 homes
• Site A43a – Land for new north and south facing slip roads to/from A3 at Send Marsh / Burnt Common
• Site A44 – Land West of Winds Ridge â€“ 40 homes and 2 traveller pitches

The proposed allocation of site A43 for 400 homes would result in a population increase of 48% in Send Marsh / Burnt Common, assuming an average of 2.3 people per dwelling (this is based upon the average set out in the 2011 UK census). This represents an average population increase of 3.2% per annum across the plan period, significantly higher than ONS projections of 0.57% per annum for the UK for the same period.

For comparison, allocations A42 and A44 would result in a population increase of 8% in Send across the plan period, or 0.5% per annum. Whilst the Parish Council do not support draft allocations A42 and A44, they consider this population increase to represent a more organic rate of growth for a settlement of this size.

Send Parish object to the proposed level of residential allocations on the grounds that they do not represent sustainable development. Considering there is a demonstrable over-allocation of housing beyond what is required to meet the Borough’s objectively assessed needs, the number of allocated homes in Send Marsh / Burnt Common should be significantly reduced.

Sections four and five of this report address the allocations that the Parish consider to be inappropriate and unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17148  Respondent: 15667937 / Vail Williams LLP (James Williams)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 (Homes for all) provides details relating to the choice and mix of housing to help create balanced, sustainable and inclusive communities. Within Policy H1 there is a sub-section for specialist housing that states “we will support the provision of well designed specialist forms of accommodation in appropriate sustainable locations, taking into account local housing needs”. However, there is no clarification on what “local housing needs” actually means in terms of geographically coverage. We believe it is reasonable to assume this is in reference to the whole of Guildford Borough, as this is the split identified in the SHMA derived from the whole HMA. However, the Policy should be explicit and confirm it is Borough wide.

On development sites of 500 homes or more it is a requirement that Traveller accommodation should be provided on site. It is considered that a similar wording for specialist housing would ensure sufficient delivery of specialist housing, including care homes, on the larger sites (c.1,500+ homes). Providing the opportunity to incorporate an appropriate housing mix, with careful design and layout, within a larger scheme; thereby creating a balanced, sustainable and inclusive community as required by Policy H1.

Under housing mix in Policy H1, the second paragraph currently states “development that results in the net loss of housing or specialist housing, including sites allocated for housing within the Local Plan will not be permitted”. This element of the policy is overly restrictive and could conflict with other policies in the Plan (for example E1 – Sustainable employment).
and it is proposed that it should be removed. There would still be the opportunity to ensure proposals respect and respond to local character, density and site specific concerns through other policies and also through Part 2 of the Local Plan, which will provide detailed development control policies.

In terms of monitoring for housing delivery, the policies and monitoring are clear on C3 use; with the overall target of 13,860 contained within Policy S2. However, paragraph 4.2.7 is confusing and contradictory in terms of monitoring especially student accommodation and Use Class C2 residential institutions for older people. The Policy separates C3 use from C2 residential institutions; as these are identified separately within the SHMA. As these are split, “purpose-built student accommodation on campus and Use Class C2 residential institutions for older people are considered separately from general housing needs in this plan”, it makes sense to monitor these targets separately to ensure a suitable mix of housing is delivered over the plan period. However, paragraph 4.2.7 continues and states that “Any additional student accommodation or residential institutions built over and above projected need (as identified in the SHMA) will count towards the general housing requirement, based on the amount of accommodation it releases into the general housing market.” This appears to allow the Council to count student accommodation and C2 use, which they state (and the SHMA identifies) as separate requirements, towards their general overall C3 housing requirement.

Page 37 contains the monitoring indicators associated with Policy H1. This includes the different sizes and types of housing to ensure the appropriate mix and density of development. Older person’s specialist housing (including care homes) are listed as a separate indicator to be monitored, however there is no specific target within Policy H1 (or indeed Policy S2) to monitor against nor is one specified within the table on page 37. The Policy and monitoring appear to conflict and it is not explicitly clear if these are separate or are a combined requirement. If the Council is seeking to provide older persons’ specialist housing (including care homes) separately, then there should be a specific number for care home bedspaces identified within Policy. Currently this monitoring has no relevant policy associated with it and paragraph 4.2.7 potentially allows double counting towards the C3 requirement. It is also considered inappropriate for the Plan to simply refer the mix within the ‘latest SHMA’, as this does not provide clarity and is ineffective; especially if draft versions or addendums to the SHMA are issued and their status, in terms of the policy, is vague.

Furthermore, in relation to housing for older people, paragraph 4.2.11 identifies the changes in ageing population and the need for the housing stock to be flexible to enable people to remain in their own homes for longer. It further identifies the option for smaller homes which will enable people to downsize and remain in their local community rather than move to specific care home provision. This can be achieved through good design such as level access, door openings and layout and circulation space to enable people to continue to live independently. It is agreed that these considerations contained within paragraph 4.2.11 are valid and reflects both national policy and the evidence base contained within the Strategic Housing Market Assessment. If successful, implementation of this policy approach will reduce further the need for care home provision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17146   Respondent: 15667937 / Vail Williams LLP (James Williams)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This representation and comments focus primarily on housing policies, including specialist housing. The plan contains strategic level policies and Policy S1 relates to the presumption in favour of sustainable development and is an over-arching strategic policy compliant with the NPPF. It is welcomed that the Council will take a positive approach that reflects the presumption in favour of sustainable development. It is also supported that the Council will work proactively with applicants, jointly to find solutions that mean proposals can be approved wherever possible. This is a positive strategic policy within the local plan, reflecting national guidance, and it is noted in Paragraph 4.1.1 (of the Guildford Submission Local Plan) that “Local plans must plan positively to seek opportunities that meet the areas’ objectively assessed development needs and be flexible enough to adapt to rapid change”. Given the plan period of 20 years, the requirement for flexibility within planning policy to respond to changes is important and should be engrained throughout the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLP16/17147  **Respondent:** 15667937 / Vail Williams LLP (James Williams)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Policy S2 (Borough wide strategy) provides details for the overall housing numbers, and other uses, to be delivered over the plan period. Policy S2 contains the requirement for 13,860 new homes to be delivered over the plan period (2013-2033). This equates to an average of 693 per annum. It also sets the requirement for floor space in relation to B1(a) and B1(b) uses, and 4.7 – 5.3 hectares for industrial (B1c, B2 and B8), along with a target of 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Show people between 2012 and 2017 and then an additional 30 pitches and 2 plots up to 2027. In relation to Gypsies and Travellers, Policy S2 caveats the numbers that any new target will replace these figures “as identified within an updated Traveller Accommodation Assessment.”

Unlike the proposed C3 provision for new homes, B1 uses, and sites for Gypsies and Travellers, Policy S2 does not contain a target for care home provision (C2 use). This is identified separately from the need for identified housing (C3): “In addition, the SHMA indicates a need for 1,031 bedspaces in care homes – 242 in Guildford, 396 in Waverley and 393 in Woking. This does not form part of the household population and so is separate to the need identified for housing” (Strategic Housing Market Assessment, September 2015, paragraph 10.53). This is also identified in paragraph 4.2.3 (local plan), where it notes key points from the SHMA 2015 including “there is an estimated need for 242 registered care bedspaces over the plan period”. This equals 12.1 care bed spaces per year.

Whilst associated with monitoring and Policy H1, the separation of care bedspaces continues in paragraph 4.2.7. The plan states that Use Classes C3 will contribute towards the new homes target and that “purpose-built student accommodation on campus and Use Class C2 residential institutions for older people are considered separately from general housing needs in this plan”. Indeed, the monitoring indicators on page 30 identify the targets contained within Policy S2 and will monitor the new homes completed each year, the amount of employment floor space, and the number of traveller pitches and travelling show people plots. However, there is no mention of a separate requirement or target for bedspaces / care homes within Policy S2.

With reference to the overall housing numbers identified within Policy S2, there is a requirement for 13,860 new homes. The table contained within the policy only totals 10,395, short of the requirement for 13,860. However, it is noted that the indicative annual housing targets start in the year 2018, whereas the plan period runs from 2013 and it is assumed that this explains the difference. It is considered that, as currently presented, this is misleading and the table should cover the whole plan period, including actual completions in the years preceding adoption to demonstrate the whole housing requirement.
This would provide a clearer indicative annual approach demonstrating how the Council are going to deliver the overall housing requirement for the plan period. This should also incorporate the required flexibility within the housing figures, to ensure that the overall target is met and sufficient flexibility is built into the plan, as required by the NPPF.

As already mentioned the NPPF contains a presumption in favour of sustainable development and requires flexibility, it is therefore suggested that within the first sentence of Policy S2 that the words “at least” are inserted in relation to the 13,860 new homes. The figure contained within Policy S2 should not be absolute, and any further proposals that are sustainable and in accordance with the NPPF and the development plan, should be approved without delay.

This proposed wording will also facilitate the Duty to Cooperate, allowing the flexibility to contribute to the wider unmet need within the Housing Market Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17149</th>
<th>Respondent: 15667937 / Vail Williams LLP (James Williams)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Linden Homes are the landowners of a site located within Guildford, 179 Epsom Road, which was a former care home. The site is contained within the Land Availability Assessment (LAA, May 2016) under site reference 2235. Whilst Guildford Borough Council considers that the most appropriate use of the site should be for a care home (C2) use, it should be recognised that the site has been vacant since March 2014 following a planned closure. The site was declared surplus to requirements by Surrey County Council in recognition of changing national policy to keep people in their own homes and in the community for longer. Linden Homes who acquired the site in July 2015 from Surrey County Council, are actively promoting C3 use on the site: planning application ref: 15/P/01304 for “The demolition of the existing care home building and the erection of 24 dwellings”. This application, now at appeal provides the ability to deliver 24 homes (16 private / 8 affordable), making a useful contribution towards delivery of the Borough’s objectively assessed housing needs on a brownfield site within the existing built up area. Plans indicating the site location and proposed housing offer are attached:

- 2277 – A – 1000 – A Red Line Location Plan (Omega Partnership) - 2277 – C – 1005 – N Site Layout (Omega Partnership)
- 2277 – C – 1100 – B Existing Wider Aerial Site Plan (Omega Partnership) - 2277 – C – 1101 – C Proposed Wider Aerial Site Plan (Omega Partnership) - 2277 – SK – 1010 – F Aerial Perspective (Omega Partnership)

In reference to the policies to provide a suitable mix of housing and deliver the required number of bed spaces, as set out in the SHMA (albeit not contained within Policy S2 or H1), the site should be considered against the proposed allocations policies that contain numerous reference to care homes and specialist housing. For care homes the proposed allocations include:

Policy A22 (land north of Keens Lane, Guildford), which along with 140 homes is allocated for a care home for “approximately 60 beds”.

Policy A46 (land to the south of Normandy and north of Flexford) is allocated for approximately 1,100 homes and specialist housing, and in addition it also includes “approximately 60 beds” for a residential care home.
Furthermore, there are a number of other relevant allocations, including:

Policy A25 (Godstone Hill Farm, Mallow Lane) – Residential lead mixed use development, allocated for: “Approximately 2000 homes (C3), including some specialist housing and self-build plots…”

Policy A26 (Blackwell Farm, Hogs Back) - Residential lead mixed use development, allocated for: “Approximately 1800 homes (C3), including some specialist housing and self-build plots…”

Policy A35 (Land at former Wisley Airfield, Ockham) – Residential lead mixed use development, allocated for: “Approximately 2000 homes (C3), including some specialist housing and self-build plots…”

Each of these Policies proposes circa. 2,000 homes and are stated to provide “some specialist housing”.

Whilst the numbers for specialist housing are not set within the policies, the sites identified above would be capable of providing significant C2 care home bed spaces. Given the size of these proposed allocations, they would easily be able to meet the required need for care homes, as set out in the SHMA (242 care bed spaces over the whole Plan period, equating to an average of 12.1 per annum). Furthermore, other allocated sites and other sites within the developed areas could also be owned, or purchased by, a care home provider thereby providing an additional source for meeting the C2 need of the Borough.

Therefore, it is easily possible to deliver the required number of care homes (identified in the SHMA: 242 care bed spaces over the plan period / 12.1 per year) through the proposed allocated sites contained within the proposed submission Local Plan.

179 Epsom Road, Guildford, is clearly available now and the site is suitable for residential development, as it is sustainable, being within the main built up area boundary of Guildford, and within a predominantly residential area. We would urge Guildford Borough Council to consider this site as an allocated site for C3 housing.

The delivery of housing, to meet all needs within the Borough and the wider Housing Market Area, is a fundamental part of the plan as detailed in the Strategic Policy S2 (13,860 new homes over the Plan period / 693 dwellings per year). The site is available immediately for the delivery of much needed market and affordable housing within Guildford Borough.

This will assist with the quick delivery of housing, in accordance with the NPPF, and to help ensure a regular supply of housing within the early part of the plan period. This is especially important as the proposed indicative annual requirement is weighted towards the later part of the plan period, rather than focusing on the immediate delivery of housing.

Examination

Given the high importance placed on housing delivery by National Policy, local authorities should “boost significantly the supply of housing” (NPPF paragraph 47), and the representations above, we wish to express an interest in participating at the examination and attend any pre-examination meetings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 2277-C-1005-N Coloured Site Layout.pdf (880 KB)
- 15_P_01304-LOCATION_PLAN-821415.pdf (122 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Introduction and Background

1.1. Tibbalds Planning and Urban Design is the appointed planning consultant acting on behalf of the Police and Crime Commissioner for Surrey. These representations relate to the June 2016 consultation of the Proposed Submission version of the Local Plan: Strategy and Sites document, which is open for consultation until Monday 18 July.

1.2. This supporting statement sets out the case for amending draft allocation A32 for the Surrey Police Headquarters. The site is allocated in the Proposed Submission Local Plan for approximately 116 homes and we consider there to be a strong case for increasing the allocation to approximately 200 homes by expanding the southern boundary of the site. The proposed new area for allocation is shown on plan ref. 5630/02.

1.3. These representations explain how the proposed increase in housing numbers is a sustainable option to deliver additional housing in the Borough that accords with national and local policy. The following documents have been submitted in support of these representations:

1. Plan ref. 5630/01 - Opportunity for Additional Residential Development (see appendix)
2. Plan ref. 5630/02 – Potential Additional Allocated Area (see appendix)
3. Ecological Walkover Survey– WYG
4. Highways and Access Technical Note – WYG
5. Landscape and Visual Impact Appraisal + supporting landscape plans – WYG

2. Green Belt

2.1. The Mount Browne site has historically been included within the Green Belt. Policy P2 of the June 2016 Proposed Submission Local Plan recognises that Green Belt boundaries are only to be modified in exceptional circumstances and through the Local Plan process. In light of the development pressures within Guildford the Council are proposing to inset some sites from the Green Belt. This policy identifies Mount Browne as a major previously developed site that is to be inset from the Green Belt:

Site A32 – Surrey Policy Headquarters, Mount Browne, Sandy Lane, Guildford

2.2. The site is allocated for approximately 116 homes and is required to ‘provide positive benefit in terms of landscape and townscape character and local distinctiveness and have regard to the identified landscape character areas’.

2.3. The draft local Plan proposes that the Green Belt boundary is partially redrawn around the Mount Browne site, but these representations recommend that this is extended to include the developable areas in the south, reflecting the logical boundaries of the site and directing development to areas that will have the least visual impact. This does not mean that development would or should include the entire allocation area, but would reflect logical site boundaries. This proposed change would retain existing areas of ancient woodland and other wooded areas that screen the site. This would provide the opportunity for additional homes and also allow for wider landscaping and open space provision and management across the site consistent with the principles of the current draft allocation. This approach is consistent with other allocations in the draft Local Plan.

2.4. Section 9 of the March 2012 National Planning Policy Framework sets out national policy for protecting Green Belt Land between paragraphs 79 and 92. The NPPF states that ‘the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence’ (para 79).
2.5. Paragraph 80 of the NPPF sets out the five purposes served by the Green Belt. We consider that the proposed extension of the Mount Brown Green Belt inset would be in accordance with all five points and would not cause any harm to the Green Belt. These points are developed further in the following sections of the representations, but in summary:

1. To check the unrestricted sprawl of large built-up areas

2.6. The Mount Browne site is located c.370m to the south of the designated Guildford Urban Area, as defined by the draft Proposed Submission Local Plan proposals map. Although not within the defined urban area, the site is not isolated and is close to the University of Law site (allocation A33), A3100 road and Artington park and ride. Allocating this site for additional development would represent a natural and compact extension to urban area, reflecting the existing urban form.

2.7. It is important to consider this proposal in light of other draft land allocations in the Borough. There is a recognised shortage of developable land, requiring several large sites to be released from the Green Belt to deliver housing. Although this proposal represents a small extension to the Guildford urban area, it should be considered as an appropriate and sustainable option when compared to many of the other proposed Green Belt insets.

2. To prevent neighbouring towns merging into one another

2.8. The Mount Browne site is located c.370m to the south of the Guildford Urban Area and c.2.2km to the north of Farncombe. Extending allocation A32 an additional 200m to the south would have no discernible impact on the separation between the two settlements.

3. To assist in safeguarding the countryside from encroachment

2.9. Although located in the Green Belt, the site has been used for a variety of purposes that are not consistent with typical countryside uses. The area has historically been used for private recreational purposes, including a sports pavilion, a landscaped sports pitch and a car park. Parts of the southern area are therefore classed as previously developed land. Although the amenity space is not classed as previously developed land, it is also not open countryside. Extending the A32 allocation southward would not encroach into the countryside in light of the previous uses and strong site boundaries.

4. To preserve the setting and special character of historic towns

2.10. There are no towns of special character that would be impacted by this proposal. The St Catherine’s conservation area is located directly to the north of the A32 allocation.

5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

2.11. Part of the site is classified as previously developed land in accordance with the NPPF definition and the remainder has been heavily landscaped. Since this site is now redundant, allocating it for housing represents an appropriate alternative use.

2.12. These points are developed in more detail below.

2.13. The January 2013 Guildford Borough Green Belt and Countryside Study has been used to inform how land should be released from the Green Belt in the new Local Plan. Volume V explores major previously development sites and identifies Mount Browne Police Headquarters as one of eleven potential sites for release from the Green Belt.

2.14. The appraisal of the Mount Browne site contained within section 20 of Volume V recognises that the majority of the site is considered to exhibit a visually enclosed character with a limited contribution to the wider Green Belt. It was considered appropriate to recommend the Mount Browne site for insetting within the Green Belt due to it not presenting a visually open character and possessing defensible boundaries. This assessment sets out potential boundaries for insetting from the Green Belt.

2.15. Whilst we recognise that there is more previously developed land on the northern section of the site, the area to the south could be inset from the Green Belt with few negative impacts, consistent with the conclusions of the Green Belt and Countryside Study.
2.16. It is worth noting that one of the original purposes of creating the Green Belt was to provide access to public open space and recreation areas. It is clear that the Green Belt includes land of variable quality and we encourage the Council to consider how the land within the Green Belt is used and whether there is public benefit to its continued designation. The Local Plan acknowledges that there are significant development pressures within Guildford Borough and a lack of land for development. Since the Council recognises that there is a need for the careful release of Green Belt land to meet development pressures in the area, the most sustainable locations should be given priority over less sustainable sites in more rural areas.

2.17. The proposed submission Local Plan designates 14 villages to be inset from the Green Belt. We recognise that this approach is broadly in line with national guidance, which states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt.

2.18. Whilst we acknowledge that the insetting of villages is in accordance with national policy, there are a number of proposed allocations that would extend the Green Belt insetting significantly beyond what is considered to be the natural boundary of each settlement in accordance with the January 2013 Green Belt and Countryside Study. A review of the allocations set out in the Proposed Submission Local Plan indicates that 431 homes are allocated in inset villages and infill development within identified Green Belt villages. Whilst some of these allocations are appropriate and sustainable, others are large green field sites, formerly within the Green Belt, on the edge of small villages with limited previously developed land and poor access to community facilities. If these sites are considered to be suitable for allocation in light of national policy, then the proposed extension to allocation A32 should also be considered to be appropriate.

2.19. In addition to the inset villages, seven major previously developed sites are inset from the Green Belt, including Mount Browne. Sites identified as previously developed land in the Green Belt are scheduled to deliver 216 homes throughout the plan period according to the sites schedule on pages 123 – 126 of the Proposed Submission Local Plan.

2.20. We considered this proposed approach to be unsound on the grounds that it is not the most sustainable strategy. Paragraph 84 of the NPPF states that ‘when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary’. This policy clearly requires priority to be given to the most sustainable locations. The sustainability credentials of Mount Browne are explored in detail in the following section, but since there is a clear opportunity to deliver approximately 84 additional homes in a highly sustainable location on the edge of Guildford with excellent public transport and very limited visual impact, this should be prioritised over far more isolated sites in smaller settlements.

3. Sustainability

3.1. Delivering sustainable development is a driving principle of the NPPF. Paragraph 17 states that planning should ‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable’. In addition, paragraph 30 states that ‘encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport’. Overall we consider Mount Browne to represent a highly sustainable location that provides good access to non-car modes of public transport.

3.2. The June 2016 Sustainability Appraisal sets out the sustainability credentials for each of the proposed allocated sites. A traffic light approach is used to appraise individual sites. Site A32 is shown to be one of the more sustainable allocations in the Borough, with greenlights against 11 of the 21 criteria. Although access to shops and schools are considered to be relatively poor, the Mount Browne site is still considered to be more sustainable than many other allocated housing sites with worse sustainability credentials. The proximity of Guildford town centre coupled with good public transport links gives the Mount Browne site excellent access to the facilities provided there.

3.3. The May 2014 Settlement Hierarchy Document is identified as key evidence in the Proposed Submission Local Plan. This document divides the settlements in Guildford Borough into the following hierarchy in order to promote sustainable development:
1. Urban Area (Guildford)
2. Rural Service Centre x 1
3. Large Villages x 11
4. Medium Villages x 6
5. Small Villages x 6
6. Loose knit / hamlets x 13

3.4. This report confirms that the Guildford Urban area is by far the largest settlement in the Borough with the best access to jobs, education, public transport, health care facilities and shops. Locating additional residential development at the edge of the Guildford Urban Area, with excellent public transport links, therefore presents a very sustainable option.

3.5. The proposal for approximately 200 houses would result in a significant reduction in vehicle movements than that which currently exist. Section six of the attached transport technical note demonstrates that the site currently generates approximately 391 trips between 0700 – 0900 and 397 trips between 1600 – 1800, in addition to other vehicle movements throughout the day necessitated by the police headquarters operations.

3.6. The technical note demonstrates that even in a worst case scenario, the proposed development of 200 houses on the site would generate approximately 191 trips between 0700 – 0900 and 212 trips between 1600 – 1800. This demonstrates that developing the site for 200 units would generate significantly fewer two-way vehicle trips when compared to the current operation, providing a significant net benefit to the operation of the existing site access, local junctions and the local highway network.

3.7. NPPF paragraph 35 states that ‘developments should be located and designed where practical … to give priority to pedestrians and cycle movements, and have access to high quality public transport facilities’. Increasing the allocation on the Mount Browne site from 116 to 200 would help deliver a scheme that accords with these principles.

3.8. Extension of the site allocation boundary to include the southern area of the site will allow improved access to the Artington Park and Ride site and bus routes into Guildford town centre. The footway along The Ridges runs east to west linking to the A3100 footway which provides a connection to Artington Park and Ride. This is approximately a 700m walk from the edge of site A32.

3.9. Extending the allocation to the south will form a more natural connection between the sites by reducing the site edge to park and ride walking distance to approximately 450m. The Artington Park and Ride is served by the number 200, which provides 5 to 6 services per hour to Guildford Bus Station from Monday to Saturday, operating between 0730 and 1920. The Artington Park and Ride is also identified for improved bus services by the June 2016 Guildford Borough Transport Strategy (ASP7).

3.10. In addition to the Park and Ride, bus stops are located on the A3100, just north of the junction between The Ridge and the A3100. These bus stops are served by a number of services (42, 70, 71, 72, 506 and 523) which collectively provide on average 4 services per hour to Guildford bus station, from Monday to Saturday operating between 0645 and 2000, with a reduced service on Sunday.

3.11. Guildford Railway Station is located 2.1km from the proposed development site and can be reached within 25 minutes by walking, 18 minutes by walking to the A3100 bus stops and changing at the bus station or by 10 minutes by cycling.

3.12. Route 22 of the National Cycle Network is located to the north of the site, within a 5 minute cycle ride. Route 22 provides a signed route into the Guildford Cycle Network and wider area. Cyclists would access the route by using the local road network and considering that Guildford is within a 10 minute cycle ride, it is likely that use of this route to access Guildford would be a favourable option for regular commuters.

3.13. Overall we consider the Mount Browne site to be very well located to encourage non-car journeys and will reduce the number of trips generated to and from the site, even with an increase in allocation from 116 to 200 homes.

4. Housing
4.1. The proposed additional homes on the Mount Browne site could contribute to housing delivery for the Borough in the early years of the plan period, with new units on the extended area potentially coming forward before those within the footprint of the existing buildings and facilities on site.

4.2. The June 2016 proposed Submission Local Plan recognises that there is an objectively assessed need to deliver an average of 693 dwellings per annum in accordance with the findings of the September 2015 West Surrey Strategic Housing Market Assessment (SHMA). Policy S2 of the Proposed Submission Local Plan states that the Council’s preference is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). The Guildford urban area is the most significant settlement in the Borough, identified as the most sustainable settlement in the Borough by the May 2014 Settlement Hierarchy Report. Guildford is the closest settlement to the Mount Browne site, the designated edge of which is approximately 370m to the north of the site. Development should therefore be prioritised in the Guildford Urban Area where possible since this is recognised as the most sustainable location.

4.3. Table 1 attached to Policy S2 demonstrates that land has been allocated to deliver 13,652 homes throughout the plan period. 2,742 (20%) of these are to be delivered in Guildford town centre and the Guildford urban area, with the remainder being delivered via an urban extension to Guildford and significant development in smaller settlements. Whilst we recognise that not all development can be located in Guildford, all opportunities should be taken to deliver housing in the most sustainable locations. This can take advantage of existing infrastructure, unlike the large strategic greenfield developments proposed elsewhere in the Borough that will require significant new infrastructure.

5. Area of Outstanding Natural Beauty and Landscape Impact

5.1. The Mount Browne site is located within the Surrey Hills AONB. Paragraph 115 of the NPPF states that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty’. Paragraph 116 states that planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. We consider the proposed changes to allocation A32 to have minimal impacts on the AONB as set out below.

5.2. Policy P1 of the Proposed Submission Local Plan sets out the following criteria for development in the AONB.

- conserve and/or enhance the setting and views of the AONB
- conserve wildlife, historic objects or natural phenomena within it
- promote its enjoyment by the community and visitors to the area
- support the rural economy of the Surrey Hills area
- provide or maintain public access to the AONB.

5.3. We have set out below how we consider that the proposed change to allocation A32 to accord with national and local policy.

5.4. Firstly, a significant proportion of the Mount Browne site is already allocated for development. The existing draft A32 allocation sits within the designated Surrey Hills AONB. Policy A32 states that provision must be made to provide positive benefit in terms of landscape and townscape character and local distinctiveness and have regard to the identified landscape character areas, recognising that it is possible to develop this site without having an undue impact on the AONB.

5.5. The attached Landscape and Visual Impact Appraisal prepared by WYG evaluates the site and surrounding landscape. The methodology used for this landscape and visual appraisal is based on the recommendations in Guidelines for Landscape and Visual Impact Assessment 3rd Edition published by The Landscape Institute and the Institute of Environmental Management & Assessment in 2013 (GLVIA3). ?

5.6. The report sets out the internal topography of the site, which varies considerably between the northern and southern parts of the site sloping down from approximately 100m AOD to 50m AOD in the south east corner. The northern area, where the current police facilities are located, is marked by a series of steep changes in level and is set on the edge of the ridge line running east-west. This is contrasted by the gradual change in level on the southern part of the site which slopes from 50m AOD at the eastern boundary up to approximately 65m AOD at the western site extents. ?
5.7. Existing vegetation is a key feature and defines the character of the site. Again there is a distinct change in vegetation between the northern and southern parts of the site. The northern area is densely vegetated with numerous tree groups, and often large individual tree specimens, together with an established shrub and hedge layer. Built form is set within this landscape context creating a sense of enclosure and separation.

5.8. Tree species are a mix of deciduous and evergreen species, including both native and ornamental specimens.

5.9. The southern part of the site contains a series of more open landscape spaces, relating to former uses associated with this part of the site. A former sports hall building effectively divides the site into two parts. To the east of this building is a flat area of grass formerly used for sports pitches, with an access road providing a link to The Ridges and the highway network beyond. Localised landform has been used to create this plateau for the pitches and the ground slopes down to the access road. The boundary is well vegetated with established hedge and trees.

5.10. To the west of sports hall is a further area of amenity grass with a number of large tree specimens with the land gently sloping up to the north and west. The southern boundary is more open with several gaps in the planting offering views into the site. Along the western boundary vegetation becomes denser enclosing the path link here.

5.11. The report also assesses the potential impact on the landscape in a 4km radius of the site. This detailed appraisal demonstrates that views from the north are limited by a combination of topography and vegetation. Views are available from the south, east and west, although the extent of these are limited and filtered by the extent of mature planting on site and in the wider landscape. Existing vegetation on the site and in the wider landscape reduces and filters views to the site, including close views.

5.12. Where there is potential for long distance views, these are often limited, with only the communications mast, located on the northern part of the site, visible above the tree line. This indicates that development on the southern section of the site, up to 50m AOD below the northern area of the site, would have no impact on the long distance views.

5.13. The report sets out potential mitigation measures for any development, including a comprehensive landscape strategy, strengthening existing boundary planting, particularly along the southern boundary; incorporating tree planting throughout the development layout; and management of the existing vegetation to ensure it continues to contribute to the character and qualities of the site.

5.14. The proposed allocation does not include the whole of the area within the ownership boundary. The area ancient woodland to the east would be retained and access to the public could be improved by any future development.

5.15. Overall there is a clear opportunity to increase the extent of the proposed development area on the Mount Browne site without impacting on the wider landscape. This is primarily due to the sloping topography of the site and existing vegetation which would be retained and enhanced as part of any development proposals. It is therefore concluded that impact on the AONB is limited and that development, combined with new access to areas of open space and recreation, as well as opportunities to provide new areas of landscaping, can bring about improvements to the setting of the AONB.

6. Ecology and Biodiversity

6.1. The Mount Browne site has been appraised for any flora or fauna of note by an ecological walkover survey conducted on 30 June 2016 by WYG. The survey has been submitted alongside these representations and sets out the findings in more detail. The survey was carried out broadly in line with the Joint Nature Conservancy Council Standard Phase 1 habitat survey technique and is intended to give an initial view on the ecological quality of the site. The timing of the survey was optimal for encountering species of note.

6.2. The survey found that the different areas of the site contain a variety of habitats which vary from high to low ecological value. The amenity grassland located in Area 1, has a low ecological value whereas the semi-natural broadleaved woodland has a high ecological value, as they have potential to support various notable species. It is therefore recommended that any additional housing (within an allocation extension) is planned to be located within the amenity grassland area and hard standing / man-made habitats within Area 1. This would result in the least adverse ecological impact.
Furthermore, it is recommended that scattered mature trees, woodland and hedgerow habitats are retained wherever possible. A natural buffer (such as grassland) extending from woodland edges, should be incorporated into the design of the development where possible.

No protected species were found, but if a development were to be brought forward protected species surveys for bats, reptile, great crested newt, dormouse, badger and possibly breeding birds may be required.

Overall this demonstrates that a scheme for 200 homes on the site could be carefully designed to avoid any significant ecological impacts, building on the existing sports pitch areas and maintaining the wooded areas.

7. Heritage

The site is not located within a conservation area and there are no listed buildings on site. The nearest listed building is the Grade II listed Braboeuf Manor on the University of Law site and the nearest conservation area is St Catherine’s. Allocation A32 sits directly to the south of the conservation area and approximately 100m to the south west of the Manor.

These representations propose to allocate additional land to the south of the A32 allocation, approximately 170m to the south of the conservation area and screened by several dense tree lines, existing buildings and a significant drop in ground levels. There will therefore be no negative impact on these heritage assets.

8. Summary and Conclusions

In conclusion, the Mount Browne site is located in a sustainable location with good access to public transport and the centre of Guildford. The southern part of the site is well positioned to be developed with minimal impacts on the landscape quality of the surrounding area. Although the southern part of the site is currently allocated as Green Belt, it is sequentially preferable to many other Green Belt sites that the draft Local Plan is proposing to allocate. The A32 allocation should therefore be extended to include the additional land to the south in light of the lack of developable land in the Borough.

We therefore propose that the following change is made to the local plan policy A32:

1. Amend to say ‘The site is allocated for approximately 116 200 homes (C3)”
2. Update area to 15.4 ha
3. Update plan on page 198 to reflect amended site boundaries

The Police and Crime Commissioner for Surrey is pleased to have the opportunity to respond to the draft Local Plan and request that they are informed of any future consolation events.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- [2016_07_18 - Guildford Local Plan.pdf](2016_07_18 - Guildford Local Plan.pdf) (100 KB)
- [5630 5.6 Mount Browne Representations FINAL 18.07.2016.pdf](5630 5.6 Mount Browne Representations FINAL 18.07.2016.pdf) (8.9 MB)

Comment ID: PSLPP16/17175  Respondent: 15670785 / Mr and Mrs Poulsom  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land to the south of Tongham, currently in ‘Land Beyond the Green Belt’ is proposed for designation as “new greenbelt”. We consider there to be no merit in this new designation which is seen as little more that ‘compensating’ for the loss of Green Belt elsewhere to accommodate strategic development which is strongly opposed by many residents within the Borough. This is not a justifiable reason for creating new ‘compensatory’ Green Belt elsewhere and the proposed designation does not fulfil the five purposes of Green Belt designation.

We strongly object to the proposed designation as Green Belt of our client’s site to the east of The Street, Tongham (parcel K3). We therefore request that the plan is amended to remove its proposed designation as new Green Belt and an allocation made for housing. This is appropriate for a number of reasons. The Council has highlighted that their spatial strategy has applied a sequential approach to allocating land for development and where insufficient brown field land is available, that green-field sites in the most sustainable locations are the preferred location. The land to the east of The Street / south of Poyle Road, Tongham is land which adjoins the second most sustainable location in the Borough second only to Guildford; it currently designated ‘Land Outside the Green Belt’ and has no other fundamental constraints. To the south lies AONB which protects land on the slopes of the Hogsback but does not impinge on the subject area.

An Addendum to the Green Belt and Countryside Study was prepared in April 2014 to address criticisms of the original Study. The Addendum updated the Environmental Capacity Analysis undertaken within Volume II and that undertaken in connection with additional urban edge parcels with a clear connectivity to the existing urban edge boundaries which were not previously considered beyond Green Belt purposes. Two additional land parcels were considered: Land Parcel J1, Land at Liddington Hall Farm and Land Parcel K3, Land south of Poyle Road, Tongham. With regard to Land Parcel K3, the Addendum states at paragraph 4.10 that: ‘Significantly, the parcel does not lie within the Green Belt at present, and is instead designated as lying within ‘Countryside beyond the Green Belt, in the Local Plan’. It goes on to state at 4.11 that: ‘a PDA across the entirety of the parcel would be inappropriate and an area has instead been identified to the north of the parcel. The PDA relates to Poyle Road, and incorporates land either side of the recreation ground and a woodland block.’ And at paragraph 4.12 that: ‘The PDA covers an area of approximately 24ha and could accommodate in the region of 572 dwellings. The PDA scored 11.43 against the sustainability credentials and would therefore be ranked at the higher end of those main urban edge parcels identified for PDAs as indicated at Appendix 6’.

To therefore seek to impose Green Belt designation here within the Proposed Submission Plan is considered unjustified and restricts the Borough’s ability to provide for future needs in a sustainable way. We do not consider that a change to the Green Belt boundary in this location is justified and consider that the assessment of the Land Parcel K3 to be flawed. The result of this is/will be to place further reliance on less sustainable options elsewhere within the Borough and / or restrict the ability of the Borough to meet it’s objectively assessed housing needs into the future.

Additionally we consider that the following points also justify either allocation or safeguarding of the site for housing:

• Landscape evidence previously submitted to the Council (attached) has demonstrated the suitability of two parcels of land to be accommodated in this location without harm to the wider landscape. Whilst development would be visible from the south, the evidence noted that new development would be seen in the context of the existing urban edge of Tongham beyond. Reinforcement planting along the southern edge of the two development parcels was considered a suitable mitigation measure by the landscape consultants fabrik;

• We oppose the views raised that the area should be designated as Green Belt in order to prevent southward and eastward encroachment of Tongham towards the A31. As the landscape evidence previously submitted to the Council demonstrates, there are alternative options available which would enable more development to be sustainably delivered at Tongham, whilst also preventing continued development southwards towards the A31. The landscape plan re-provided at Appendix 1 of our representation outlines an area between the potential housing areas B and C and the A31 which should remain open. It is considered that this area of land could be used for public open space which would provide long-term protection along the southern edge of Tongham and positive implications for the AONB.
Paragraph 82 of the NPPF highlights that the general extent of Green Belts across the country is already established. Additionally it advises that:

“New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.”

We do not consider that the area of new Green Belt proposed meets the NPPF tests above. Equally, having reviewed the supporting text of Policy P2 Green Belt, we note at paragraph 4.3.17 that the plan has not sought to make any justifications against these tests and in this respect it is of note that the Green Belt and Countryside Study Volume II Addendum reassessed the northern part of Land Parcel K3 as suitable for a Potential Development Area (PDA), (the southern area being covered by AONB ad therefore not suitable for major development). In drawing the conclusion that the PDA ranked at the higher end of those main urban edge parcels identified for PDAs, it acknowledged that an area of 24ha could accommodate in the region of 572 dwellings. Suitable mitigation could be delivered to offset any impact on nearby areas of ancient woodland, the setting of nearby listed buildings, the SNCI to the east. The potential for enhancement of planting along the southern edge to assist with an appropriate relationship with the AONB further to the south on the Hog’s Back would be beneficial.

It is noted that the scoring at Appendix 1 of Volume II Addendum is wrong in relation to Land Parcel K3 which has not been updated with the reassessment. Sensitivity of this area should therefore be reduced from High Sensitivity to Medium Sensitivity.

Notwithstanding this, it is difficult to see how the Council would demonstrate why normal planning policies would not be sufficient to continue to maintain a degree of separation between Tongham and the A31 particularly in the light of the existing AONB designation to the south of this Land Parcel. Indeed, our clients SHLAA submission and supporting landscape evidence, provides the Council with a very logical alternative to secure land in this location in perpetuity (attached as Appendix 2).

In addition to the above, it is clear that the proposal to designate Green Belt in this area has clear consequences for sustainable development. The Council’s Issues and Options Paper highlighted the potential at Land Parcel K3 “to carry out further research to see if there may be some small potential development areas”. The Green Belt and Countryside Study also subsequently determined that the area should be considered as a potential development area scoring 11.43 against the sustainability credentials and therefore ranked at the higher end of those main urban edge parcels identified for PDAs.

Clearly, in designating this area as Green Belt, any subsequent release would only be able to be altered in exceptional circumstances, through the preparation or review of the Local Plan (NPPF, Paragraph 83). This indicates why decisions to designate new Green Belt should be a last resort. We do not feel that “exceptional circumstances” can therefore be demonstrated here and no new Green Belt designation should be envisaged.

Additionally we do not support the Council’s view that the land would serve the five purposes of Green Belt identified in the NPPF, Paragraph 80. We consider each of these in turn below. We also provide a copy of our Landscape and Visual Rebuttal Statement (LVRS) on Parcel K3 (November 2013) (Appendix 3) which we have previously submitted to the Council.

Unrestricted Sprawl
Unrestricted sprawl would be very unlikely to the south of Tongham as the land does not form part of an open area of countryside moving southwards. This is on the basis that it is significantly restrained to the south by the A31, which forms a defensible boundary thus preventing sprawl. Furthermore, to the south, the AONB already provides a significant planning constraint which is afforded great protection by the NPPF and would essentially restrict development moving too far southwards towards the A31 without the potential for unacceptable levels of harm to arise. Additionally, the LRVS on page 23 also responds to Volume II of the Green Belt and Countryside Study, outlining that the consensus that K3 would ‘check the southward sprawl of Tongham’ is not consistent with comments against the neighbouring parcel of K2 which identifies that land as a Proposed Development Area.

Coalescence

We do not consider that the proposed area of Green Belt would have a significant ability to prevent the coalescence of settlements. The potential development areas outlined within the LRVS (areas B and C) demonstrate how a development area can be established in this location, to accord with the eastern extreme of existing development at Tongham. As Figure 5.1 of the LRVS demonstrates (Appendix 1), this enables a large band of landscaping to be maintained between Tongham and Ash Green, as well as between Tongham and the A31. Whilst the settlement of Seale falls literally to the south of the A31, we consider it absurd to raise concerns that any development at K3 would have an impact in terms of coalescence with Seale.

The LRVS on page 23, responds in detail to this concern. Firstly, it is noted that the Green Belt purpose relates to the issue of towns merging, which in this case is irrelevant on the basis that Tongham is a village and Seale, a small cluster of development. In any event, the separation caused by the dramatic changes in site levels associated with the ridgeline caused by the A31, means that there is both physical and visual separation between the settlements to prevent coalescence. Additionally, as outlined under our consideration of sprawl above, the AONB to the south of Tongham, also restricts the extent to which development could extend southwards. For coalescence to occur, development would therefore have to extend into the AONB and onto higher levels of land adjacent to the Hogs Back to result in physical or perceived coalescence of the two settlements.

Safeguard Countryside from Encroachment

The proposed area of new Green Belt in our view has little purpose and by virtue of its surroundings would only be capable of preventing development extending southwards from the existing urban edge of Tongham. As outlined under our ‘unrestricted sprawl’ section above, the land to the south of Tongham is not located within open countryside, as experienced to the east. To the south the A31 acts as a defensible boundary in preventing encroachment into the wider countryside south of the A31, whilst AONB provides further protection of the countryside. Additionally, we have highlighted how there are other opportunities to secure the long term protection of land within this area via other planning policies and through SANGS associated with some residential development at the settlement edge. The need to designate new Green Belt in this location is not therefore supported by this Green Belt purpose.

The LRVS also concluded on page 23 that whilst currently undeveloped, K3 had the potential to include significant areas of new Green Infrastructure, which would maintain the immediate landscape settings to the AONB designation, whilst also providing a new area of landscape that could provide a new area of open space resource for the town. As the NPPF in any event seeks to support the use of areas of Green Belt for leisure purposes and see the countryside utilised more for recreation, we consider that our client’s proposals, do not vary significantly to the Council’s intentions to safeguard countryside. However, it should clearly be preferential to secure any development which can also be accommodated in the location without harm.

Setting and Special Character of Historic Towns and Assist in Urban Regeneration

We do not consider that the new area of Green Belt proposed would reflect these purposes on the basis that Tongham is not recognised in the study as a historic town.

Conclusion of the Five Purposes of Green Belt in Response to Land Parcel K3

In light of our appraisal of the five Green Belt purposes and findings of the additional landscape evidence provided to the Council in respect of the site, we continue to advocate that it is inappropriate and unwarranted to seek to allocate Parcel K3 as new Green Belt. We strongly request that the advice contained within Paragraph 82 of the NPPF is applied to the
proposal. This would demonstrate that there are alternative approaches available which could be secured through normal planning policies, that there is no necessity for Green Belt in this location and that there would be an adverse impact on the delivery of sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Appendix 1 - 2013 SHLAA Form Land East of The Street Tongham plus plan reduced.pdf (155 KB)
- Appendix 3 - LVRS Plan.pdf (133 KB)

---

Comment ID: SQLP16/1913  Respondent: 15670785 / Mr and Mrs Poulsom  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No.

We do not consider that the Green Belt and Countryside Study is adequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1914  Respondent: 15670785 / Mr and Mrs Poulsom  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No.

We do not consider the Plan to be compliant with the national policy set out in the NPPF in relation to the proposed designation of additional tracts of Green Belt which do not fulfil the five purposes of Green Belts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1915  Respondent: 15670785 / Mr and Mrs Poulsom  Agent: Vail Williams LLP (Jane Terry)
No.

We do not consider that the proposed Plan is sound as a whole in relation to the designation of new Green Belt and the implications this has for housing delivery both within the Borough and in meeting any unmet needs of neighbouring districts. In this respect, the Plan is not consistent with national policy; has not been positively prepared; is not justified and will not be effective in meeting objectively assessed needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1916  Respondent: 15670785 / Mr and Mrs Poulsom  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No.

The actions taken by the Council to conform to the Duty to Co-operate are set out in the Topic Paper Duty to Cooperate, June 2016.

In relation to the specific issue of housing, reference is made to the Housing Delivery Topic Paper which discusses the approach to meeting needs. A Memorandum of Understanding on housing delivery has been signed between Guildford, Woking and Waverley which recognises that there is unmet need within the HMA and commits the three authorities to continued future joint working to ensure housing needs across the HMA are met in full. It states that the Council is committed to continuing to explore with Waverley and Woking those areas which are most likely to lead to positive outcomes. The Topic Paper goes on however, to state that Guildford does not consider it can sustainably accommodate any unmet need arising from Woking (or from Waverley should an unmet need be identified in the future).

The Localism Act establishes that the outcome of the Duty to Co-operate should lead to effective policies on strategic cross boundary matters: It is the outcome rather than the process that is critical to complying with this legal obligation. In relation to the requirement that local plans are prepared to meet objectively assessed needs, including unmet needs from neighbouring authorities, this statement is contrary to the Duty to Co-operate as it predicates how a positive outcome can be achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/1917  Respondent: 15670785 / Mr and Mrs Poulsom  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Yes

In order that the adequacy of the Green Belt Study, the proposed new Green Belt designation and its compliance with the principles of Green Belt designation are fully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17191  Respondent: 15671201 / Susannah Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The lack of detail regarding the additional infrastructure in terms of: -

- schools
- roads - local and A3 (and A3 intersection)
- Tunnel proposal
- motorway - proximity to M25 and 2 lane section
- public transport
- parking

which ALL need to be considered fundamentally before any additional housing is approved & built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17190  Respondent: 15671201 / Susannah Parker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The loss of green belt in the surrounding area - it's gone forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17189  Respondent: 15671201 / Susannah Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan for a number of reasons: -

The amount of housing being proposed in one area of the borough, which is disproportionate to the entire borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1918  Respondent: 15671201 / Susannah Parker  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There has also been a very limited period of consultation for this scale of development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8138  Respondent: 15671297 / JB Planning Associates (Sue Foster)  Agent:
Our representations with respect to Policy A41 are set out in Section 4 of our submission.

**Representation on Policy A41: Land to the South of West Horsley**

**Introduction**

1. This representation is submitted on behalf of Countryside Properties in response to the Council’s decision to allocate Land to the South of West Horsley as a Strategic Site Allocation (Policy A41) in the Regulation 19 Proposed Submission Local Plan.

1. This pastoral farmland, of approximately 8 ha, has been identified in the Submission Local Plan as a housing allocation for approximately 90 homes (C3). The site comprises of 2 fields currently used as pasture and paddocks.

1. Below we briefly set out why we consider the proposed allocation is less sustainable than our Client’s site on land to the south of New Pond Road,

1. With regard to the landscape and visual impact of the proposed allocation and Green Belt considerations, we refer below to the key findings of the ‘Site Comparison Study’ prepared on behalf of our Client by Barton Willmore. The full findings of the Study are set out in Appendix 4.3.

1. In terms of sustainability we draw upon the findings of the Sustainability Appraisal (SA) of the Guildford Proposed Submission Local Plan, which we have, where necessary, amended to address inaccuracies that we have noted with respect to our Client’s. These results are set out in a table (see Appendix 4.4).

**Landscape and Visual Impact**

1. Barton Willmore has produced a Site Comparison Study, which provides a comparative assessment of our Client’s site against 4 other sites that have been identified as housing allocations within the Proposed Submission Local Plan. These were selected on the basis that they are also located outside of the settlement boundaries, within the Green Belt and are non-strategic. The sites are:
   - Policy A38: Land to the West of West Horsley
   - Policy A41: Land to the South of West Horsley
   - Policy A44: Land to the West of Winds Ridge and Send Hill, Send
   - Policy A47: Land to the East of The Paddocks, Flexford

2. Below we identify some of its key findings with respect to the impact of the development of Site A41 on landscape character:
   - Potential for substantial loss of vegetation along East Lane to accommodate the frontages of new development and new access routes which would comprise hedgerows and mature trees, particularly along its boundaries;
   - Further urbanisation and also the perception of encroachment of the settlement pattern in a southerly direction; and
   - Visual effects to views from the adjoining properties, and PRoW

3. With respect to the contribution that Site A41 makes to the function of the Green Belt, Barton Willmore identified that:
Development would result in the erosion of the semi-rural lane character of East Lane which would become wholly suburban in character in this location, with residential development on both sides and therefore would result in substantial encroachment. Development in a southerly direction from East Lane would result in an alteration to the settlement Furthermore, there is no robust defensible boundary to the southern part of the site, so the local landscape to the south would therefore be subject to further development pressure.

4. Barton Willmore’s study concludes that our Client’s site is comparative with the other sites in relation to landscape and visual considerations, in that it does not score significantly differently from the others to warrant its exclusion from the Proposed Submission Local Plan. In fact, our Client’s site scores considerably better in some respects to the other sites with regard to landscape and visual considerations, for example, our Client’s site is of lesser tranquillity due to the fact that it is adjoined by New Pond Road, and does not contain any footpaths, listed buildings or notable landscape features within the site.

Sustainability

5. JBPA has produced a Site Comparison Table (Appendix 4) which looks at the same 4 sites identified in the Barton Willmore Assessment in terms of their overall sustainability as proposed housing allocations. It also compares these sites with our Client’s land at New Pond Road, Farncombe, and with land to the south of Normandy and north of Flexford (Site A46) which has been brought forward as a new proposed housing allocation at the Proposed Submission Draft stage of the Local Plan. A separate representation on Site A46 is included with our submission in section 5.

6. When considering sustainability, we have drawn initially upon the findings of the Sustainability Appraisal (SA) of the Guildford Proposed Submission Local Plan. We have, however, where necessary amended the scorings to address inaccuracies that we have noted in the SA with respect to our Client’s site. This includes correcting the distance to the nearest Primary School as the SA suggests this is less than 2km, when in fact it is less than 1km. We have also identified from available MAFF records that our Client’s land contains Grade 3 agricultural land, as opposed to Grade 1 land which is identified in the SA.

7. Below we set out our key conclusions when comparing Site A41 with our Client’s site:
   - Site A41 scored poorly (red) in relation to 8 sustainability criteria, whereas our Client’s site only scored poorly in 3 criteria
   - Site A41 is further from a key employment site, healthcare facilities, recreation facilities, a secondary school and a railway station than our Client’s site.
   - Site A41 is closer to a European Site (SPA and SAC) and a Designation of Local Importance than our Client’s site.
   - Our Client’s site scored worse than A41 with respect to flood risk, and its location within the AONB, however we have demonstrated in our site specific representation in relation to our Client’s site (Section 3) that it makes limited to no contribution to the special qualities and features of the Surrey Hills AONB, and that the area of the site within a flood zone has been agreed with the Environment Agency and will be left.

Conclusion

8. Informed by the findings of Barton Willmore’s “Site Comparison Study” and the Sustainability Appraisal of the Guildford Proposed Submission Local Plan, this representation sets out why we consider the proposed allocation at land to the South of West Horsley (Site A41) is less sustainable and suitable than our Client’s site on land to the south of New Pond Road, Farncombe.

9. Barton Willmore’s study identifies that the site makes a substantial contribution to two Green Belt purposes and its development has the potential to have substantial visual effects, including the loss of vegetation along East Lane to accommodate the frontages of new development; adverse visual effects to views from the adjoining properties, and PRoW 98; and the perception of encroachment of the settlement pattern.

10. With respect to Sustainability we have determined that the site scored poorly (red) over significantly more sustainability criteria than our Client’s Thus, our Client’s site represents a more sustainable location than a comparable site identified in the Proposed Submission Local Plan.

Tests of Soundness

11. We consider that there is a risk of the Local Plan being found unsound with the proposed allocation of Site A41, instead of our Client’s site on land to the south of New Pond Road, because it will not be ‘justified’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives.
12. In view of the above considerations, we believe that Land to the South of West Horsley (Site A41) should be removed from the Local Plan prior to submission for Examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy A41.pdf (443 KB)

---

Comment ID: PSLPS16/8139  Respondent: 15671297 / JB Planning Associates (Sue Foster)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Please see our representations with respect to specific sections of the plan on the Question 6 Comments Form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy A41.pdf (443 KB)

---

Comment ID: PSLPS16/8143  Respondent: 15671297 / JB Planning Associates (Sue Foster)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our representations with respect to Policy A44 are set out in Section 4 of our submission.

**Representation on Policy A44: Land to the West of Winds Ridge and Send Hill, Send**

**Introduction**

1. This representation is submitted on behalf of Countryside Properties in response to the Council’s decision to allocate Land to the West of Winds Ridge and Send Hill as a Strategic Site Allocation (Policy A44) in the Regulation 19 Proposed Submission Local Plan.

1. This site, of approximately 9 ha, comprises three fields currently used for informal recreation. The fields are enclosed by substantial hedgerows and treecover to the north, south and west, with residential gardens to the east of the site.
1. Below we briefly set out why we consider the proposed allocation is less sustainable than our Client’s site on land to the south of New Pond Road,

1. With regard to the landscape and visual impact of the proposed allocation and Green Belt considerations, we refer below to the key findings of the ‘Site Comparison Study’ prepared on behalf of our Client by Barton The full findings of the Study are set out in Appendix 4.5.

1. In terms of sustainability we draw upon the findings of the Sustainability Appraisal (SA) of the Guildford Proposed Submission Local Plan, which we have, where necessary, amended to address inaccuracies that we have noted with respect to our Client’s These results are set out in a table (see Appendix 4.6).

**Landscape and Visual Impact**

1. Barton Willmore has produced a Site Comparison Study, which provides a comparative assessment of our Client’s site against 4 other sites that have been identified as housing allocations within the Proposed Submission Local These were selected on the basis that they are also located outside of the settlement boundaries, within the Green Belt and are non-strategic. The sites are:

- **Policy A38: Land to the West of West Horsley**
- **Policy A41: Land to the South of West Horsley**
- **Policy A44: Land to the West of Winds Ridge and Send Hill, Send**
- **Policy A47: Land to the East of The Paddocks, Flexford**

1. Below we identify some of its key findings with respect to the impact of the development of Site A44 on landscape character:

- Substantial loss of vegetation which would comprise hedgerows, long grassland and mature trees, particularly along its boundary with Send Hill;
- Further urbanisation to Send Hill and also the perception of encroachment of the settlement pattern in a westerly direction;
- Potential substantial visual effects to views from the adjoining PRoWs; and
- Substantial loss of tranquility

1. With respect to the contribution that Site A44 makes to the function of the Green Belt, Barton Willmore identified that:

- Development would result in the erosion of the semi-rural lane character of Send Hill in this location, with residential development on both sides and therefore would result in some
- The site represents a transition between the settlement and the wider landscape to the west, and forms a coherent buffer to the settlement pattern in this Furthermore, there is no robust defensible boundary to the west of the site (with the exception of the boundary tree belt) and therefore the land to the west of the site would be subject to further development pressure.

1. Barton Willmore’s study concludes that our Client’s site is comparative with the other sites in relation to landscape and visual considerations, in that it does not score significantly differently from the others to warrant its exclusion from the Proposed Submission Local Plan. In fact, our Client’s site scores considerably better in some respects to the other sites with regard to landscape and visual considerations, for example, our Client’s site is of lesser tranquillity due to the fact that it is adjoined by New Pond Road, and does not contain any footpaths, listed buildings or notable landscape features within the site

**Sustainability**

1. JBPA has produced a Site Comparison Table (Appendix6) which looks at the same 4 sites identified in the Barton Willmore Assessment in terms of their overall sustainability as proposed housing allocations. It also
compares these sites with our Client’s land at New Pond Road, Farncombe, and with land to the south of Normandy and north of Flexford (Site A46) which has been brought forward as a new proposed housing allocation at the Proposed Submission Draft stage of the Local Plan. A separate representation on Site A46 is included with our submission in section 5.

1. When considering sustainability, we have drawn initially upon the findings of the Sustainability Appraisal (SA) of the Guildford Proposed Submission Local Plan. We have, however, where necessary amended the scorings to address inaccuracies that we have noted in the SA with respect to our Client’s site. This includes correcting the distance to the nearest Primary School as the SA suggests this is less than 2km, when in fact it is less than 1km. We have also identified from available MAFF records that our Client’s land contains Grade 3 agricultural land, as opposed to Grade 1 land which is identified in the SA.

1. Below we set out our key conclusions when comparing Site A44 with our Client’s site:

1. Site A44 scored poorly (red) in relation to 7 sustainability criteria, whereas our Client’s site only scored poorly in 3 criteria.
2. Site A44 is further from a key employment site, recreation facilities, a primary school, a secondary school and a railway station than our Client’s site.
3. Site A44 is closer to a European Site (SPA and SAC) than our Client’s site.
4. The development of Site A44 would result in the loss of higher quality agricultural land than our Client’s site.
5. Our Client’s site scored worse than A44 with respect to flood risk, and its location within the AONB, however we have demonstrated in our site specific representation in relation to our Client’s site (Section 3) that it makes limited to no contribution to the special qualities and features of the Surrey Hills AONB, and that the area of the site within a flood zone has been agreed with the Environment Agency and will be left undeveloped.

1. Beyond the sustainability criteria considered above, it is also worth noting that the site is a former quarry and there is also therefore the potential for poor ground conditions which may affect the deliverability and viability of developing the site.

Conclusion

1. Informed by the findings of Barton Willmore’s “Site Comparison Study” and the Sustainability Appraisal of the Guildford Proposed Submission Local Plan, this representation sets out why we consider the proposed allocation at Land to the West of Winds Ridge and Send Hill (Site A44) is less sustainable and suitable than our Client’s site on land to the south of New Pond Road.

1. Barton Willmore’s study identifies that the site makes a contribution to two Green Belt purposes, including a substantial contribution with respect to checking the unrestricted sprawl of built up The development of the site would result in the substantial loss of vegetation along its boundary with Send Hill, further urbanisation to Send Hill and the perception of encroachment of the settlement pattern in a westerly direction. It would also have potential substantial visual effects to views from the adjoining PRoWs; and result in a substantial loss of tranquillity.

1. With respect to Sustainability we have determined that the site scored poorly (red) over significantly more sustainability criteria than our Client’s Thus, our Client’s site represents a more sustainable location than a comparable site identified in the Proposed Submission Local Plan.

Tests of Soundness

1. We consider that there is a risk of the Local Plan being found unsound with the proposed allocation of Site A44, instead of our Client’s site on land to the south of New Pond Road, because it will not be ‘justified’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives.

Proposed Modifications

1. In view of the above considerations, we believe that Land to the West of Winds Ridge and Send Hill (Site A44) should be removed from the Local Plan prior to submission for Examination.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy A44.docx (54 KB)

Comment ID: PSLPS16/8144  Respondent: 15671297 / JB Planning Associates (Sue Foster)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Please see our representations with respect to specific sections of the plan on the Question 6 Comments Form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy A44.pdf (442 KB)

Comment ID: PSLPS16/8145  Respondent: 15671297 / JB Planning Associates (Sue Foster)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our representations with respect to Policy A47 are set out in Section 4 of our submission.

Representation on Policy A47: Land to the East of The Paddocks, Flexford

Introduction

1. This representation is submitted on behalf of Countryside Properties in response to the Council’s decision to allocate Land to the East of the Paddocks as a Strategic Site Allocation (Policy A47) in the Regulation 19 Proposed Submission Local Plan.

1. This site, of approximately 2 ha, comprises three fields on gently sloping topography. The fields are enclosed treebelts to the north, hedgerows within open farmland to the east, residential gardens to the south, and treebelts to the west.
1. Below we briefly set out why we consider the proposed allocation is less sustainable than our Client’s site on land to the south of New Pond Road, Farncombe.

1. With regard to the landscape and visual impact of the proposed allocation and Green Belt considerations, we refer below to the key findings of the ‘Site Comparison Study’ prepared on behalf of our Client by Barton Willmore. The full findings of the Study are set out in Appendix 4.7.

1. In terms of sustainability we draw upon the findings of the Sustainability Appraisal (SA) of the Guildford Proposed Submission Local Plan, which we have, where necessary, amended to address inaccuracies that we have noted with respect to our Client’s site. These results are set out in a table (see Appendix 4.8).

Landscape and Visual Impact

1. Barton Willmore has produced a Site Comparison Study, which provides a comparative assessment of our Client’s site against 4 other sites that have been identified as housing allocations within the Proposed Submission Local Plan. These were selected on the basis that they are also located outside of the settlement boundaries, within the Green Belt and are non-strategic. The sites are:

Policy A38: Land to the West of West Horsley
Policy A41: Land to the South of West Horsley
Policy A44: Land to the West of Winds Ridge and Send Hill, Send
Policy A47: Land to the East of The Paddocks, Flexford

1. Below we identify some of its key findings with respect to the impact of the development of Site A47 on landscape character:

- Potential for substantial loss of vegetation;
- Extension to the settlement pattern in an easterly direction; and
- Adverse effect on public and private views

1. With respect to the contribution that Site A44 makes to the function of the Green Belt, Barton Willmore identified that:

- The fact that development is already present on the site demonstrates that the site has a limited function when it comes to safeguarding the countryside from encroachment.
- Development would result in the eastward sprawl of Flexford.

1. Barton Willmore’s study concludes that our Client’s site is comparative with the other sites in relation to landscape and visual considerations, in that it does not score significantly differently from the others to warrant its exclusion from the Proposed Submission Local Plan. In fact, our Client’s site scores considerably better in some respects to the other sites with regard to landscape and visual considerations, for example, our Client’s site is of lesser tranquility due to the fact that it is adjoined by New Pond Road, and does not contain any footpaths, listed buildings or notable landscape features within the site.

Sustainability

1. JBPA has produced a Site Comparison Table (Appendix 4.7) which looks at the same 4 sites identified in the Barton Willmore Assessment in terms of their overall sustainability as proposed housing allocations. It also compares these sites with our Client’s land at New Pond Road, Farncombe, and with land to the south of Normandy and north of Flexford (Site A46) which has been brought forward as a new proposed housing allocation at the Proposed Submission Draft stage of the Local Plan. A separate representation on Site A46 is included with our submission in section 5.
1. When considering sustainability, we have drawn initially upon the findings of the Sustainability Appraisal (SA) of the Guildford Proposed Submission Local Plan. We have, however, where necessary amended the scorings to address inaccuracies that we have noted in the SA with respect to our Client’s site. This includes correcting the distance to the nearest Primary School as the SA suggests this is less than 2km, when in fact it is less than 1km. We have also identified from available MAFF records that our Client’s land contains Grade 3 agricultural land, as opposed to Grade 1 land which is identified in the SA.

1. Below we set out our key conclusions when comparing Site A47 with our Client’s site:

1. Site A47 scored poorly (red) in relation to 8 sustainability criteria, whereas our Client’s site only scored poorly in 3 criteria.
2. Site A47 is further from a key employment site, recreation facilities, a primary school, a secondary school and an “A” Road than our Client’s site.
3. Site A47 is closer to a European Site (SPA and SAC) and a Designation of Local Importance than our Client’s site. The majority of the site is designated as an SNCL.
4. Our Client’s site scored worse than A44 with respect to flood risk, and its location within the AONB, however we have demonstrated in our site specific representation in relation to our Client’s site (Section 3) that it makes limited to no contribution to the special qualities and features of the Surrey Hills AONB, and that the area of the site within a flood zone has been agreed with the Environment Agency and will be left undeveloped.

Conclusion

1. Informed by the findings of Barton Willmore’s “Site Comparison Study” and the Sustainability Appraisal of the Guildford Proposed Submission Local Plan, this representation sets out why we consider the proposed allocation at Land to the East of the Paddocks as a Strategic Site Allocation (Policy A47) is less sustainable and suitable than our Client’s site on land to the south of New Pond Road, Farncombe.

1. Barton Willmore’s study identifies that the site makes a contribution to two Green Belt purposes. Its development would result in the substantial loss of vegetation; an extension to the settlement pattern in an easterly direction; and an adverse effect on public and private views.

1. With respect to Sustainability we have determined that the site scored poorly (red) over significantly more sustainability criteria than our Client’s site. Also, the majority of the site is designated as an SNCL. Thus, our Client’s site represents a more sustainable location than a comparable site identified in the Proposed Submission Local Plan.

Tests of Soundness

1. We consider that there is a risk of the Local Plan being found unsound with the proposed allocation of Site A47, instead of our Client’s site on land to the south of New Pond Road, because it will not be ‘justified’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives.

Proposed Modifications

1. In view of the above considerations, we believe that Land to the East of the Paddocks as a Strategic Site Allocation (Policy A47) should be removed from the Local Plan prior to submission for Examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy A47.docx (53 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Please see our representations with respect to specific sections of the plan on the Question 6 Comments Form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy A47.pdf (592 KB)

Comment ID: PSLPS16/7762  Respondent: 15672545 / Future Planning & Development (Garry Hutchinson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Introduction

Future Planning & Development provide planning advice to our client Send Surrey Ltd in respect of their site Land Heath Drive Send, Woking, Surrey, GU23 7EP (‘the site’).

This Statement has been prepared in response to the Guildford Borough Council Proposed Submission Local Plan consultation (Regulation 19) which ends on 18 July 2015.

The 2.51ha site is privately owned by Send Surrey Ltd. The site is proposed to be allocated as Open Space in the Proposed Submission Local Plan. Our client has previously made representations to promote the site for housing through the Local Plan process.

Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) requires that local plans must be positively prepared, justified, effective and consistent with national policy in accordance with guidance set out in the National Planning Policy Framework (NPPF).

Send Surrey Ltd. does not consider that the draft Local Plan submitted by Guildford Borough Council meets the definition of “sound” set out in paragraph 182 of the NPPF.

The objections focus on two specific policy areas with regards to the soundness of the plan: open space and housing delivery. Both of these policy areas are pertinent to our clients’ interests in developing the site for housing, however the representations are submitted without prejudice to the development aspirations of Send Surrey Ltd.

The remainder of this statement is set out as follows:

a. The background to the site
b. The allocation of the site in the Local Plan
c. Assessment of the housing policies
d. Assessment of the open space policies
Background

Site Description

The 2.51ha site is located at *Land Heath Drive Send, Woking, Surrey GU23 7EP* in the north-western corner of the village of Send. The site is privately owned and currently has no formal use.

The site is bound by the Wey Navigation Canal to the north and west. To the south and east the site is bound by residential development which effectively forms the northern edge of the built-up part of the village.

The site is privately owned with no legal rights of way across the site. The site does not have any formal footpaths within it, however, at present, it is not enclosed.

The site is undeveloped and includes a number of mature trees with the denser tree coverage around the northern and western boundaries and open space within the centre of the site.

The site is covered by a group Tree Preservation Order (TPO). The TPO was confirmed on 9 September 1997. The Emergency TPO was made following the felling of a number of trees undertaken by a previous owner of the site. The TPO was justified upon the basis that the group of trees provided high amenity value; particularly from the Wey Navigation.

The site is in a sustainable location with easy access to services provided within the village of Send and public transport links to the facilities and services provided within neighbouring villages and towns. The site is not at risk of flooding and is located within Flood Zone 1.

Ownership and Opportunity of Delivery of Housing

The site is owned by a single company called Send Surrey Ltd (registered number 10173245). The company intends to develop the site for housing. The site is available, viable and deliverable for housing in the short-term (0 – 5 years).

Taking account of existing constraints and access, the site could deliver in the region of 30 – 40 units. The existing tree coverage and edge of settlement location encourages a low density development of around 25 dwellings per hectare over the developable part of the site which is around 1.5ha. The protected 1ha of land will ensure that the northern and western boundary of the site would retain its tree lined perimeter; this is the part of the site which contributes to the site’s visual amenity value. An indicative layout for 32 units is provided in Appendix 1.

Any residential development will provide 40% affordable housing in line with policy. The housing mix will respond to local needs and also the physical constraints of the site.

2.10 The development of the site provides an opportunity for a natural extension to the built-up part of the village whilst retaining the key features of amenity and providing public access through the site to enable it to function as open space.

Planning Background

2.11 The site was submitted to the Strategic Housing Land Availability Assessment (SHLAA) in 2014. The site was identified (reference number 052) as a potential low density site for 16 units within a timeframe of 11 to 15 years. The low density and delayed timeframe proposed by the Council was due to its perceived uncertainty of deliverability due to the multiple ownership of the site at the time. The SHLAA extract is given in Appendix 2.

2.12 The Draft Local Plan was published for consultation in June 2014 (Regulation 18).

The Draft Local Plan amended the settlement boundary to include the site. It also proposed to inset the site from the Green Belt. The Draft Local Plan Proposals Map inset for Send is given in Appendix 3.
2.13 The site was however discounted for housing in the Land Availability Assessment (May 2016) due to suitability concerns over protected open space, the TPO covering the site and the impact on the Corridor of the River Wey.

Legislative Framework and National Planning Policy Framework (NPPF)

Plan-making Policies

Paragraph 182 of the NPPF provides guidance on the Examination of Local Plans. It states “The Local Plan will be examined by the Planning Inspectorate whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Paragraph 167 relates to the appropriate use of the evidence base in the plan making process. It states “Wherever possible the local planning authority should consider how the preparation of any assessment will contribute to the plan’s evidence base. The process should be started early in the plan-making process and key stakeholders should be consulted in identifying the issues that the assessment must cover”

Open Space Policies

Open Space is defined in the NPPF as:

“All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity”

Paragraph 72 of the NPPF states “Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required”

Paragraph 74 of the NPPF states “Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”

Housing Policies

Housing delivery is at the heart of the NPPF. Paragraph 17 sets out the overarching core planning principles to underpin the plan making and decision taking process, one of which is to objectively identify the need for housing (and other development) and set out a clear strategy for allocating sufficient land which is suitable for development. Paragraph 47
relates specifically to housing supply and states “To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances

The Allocation of the Site

The allocation of the site is set out on the Proposed Submission Local Plan Proposal Map, extract below: <see attachments>

The site is designated as Open Space (pink line) and Conservation Area (brown line). The site, and the wider village, have been inset from the Green Belt boundary (green dashed line). There is no proposed settlement boundary to the village.

Send is a Rural Local Centre in accordance with the Hierarchy of Retail and Service Centres. The function of such centres is to provide for everyday retail and service needs for the local population of that immediate area with larger ones also including a number of more specialist comparison shops

The Proposed Submission Local Plan proposes to allocates the site as open space under Policy I4 - Green and Blue Infrastructure.

Policy I4 states “Open space (encompassing all open space within urban areas, land designated as Open Space on the Policies Map and all land and water that provides opportunities for recreation and sport) will be protected from development in accordance with the NPPF”

The preamble to the policy clarifies the role that open space plays “Public open space is particularly important due to the positive contribution it makes to the character of our settlements, our health and social interaction, and forms the backbone of the green infrastructure network in our settlements. Therefore it is considered that cumulatively these spaces form a valued asset of strategic importance that should be protected as a strategic priority”

Strategic Policy S2 sets out the growth in the borough over the plan period. With specific regards to housing, the policy states “During the plan period (2013-33), we will make provision for 13,860 new homes… The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision”

The policy sets out its annual housing targets over the plan period:

<table>
<thead>
<tr>
<th>Year</th>
<th>Housing Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018/19</td>
<td>500</td>
</tr>
<tr>
<td>2019/20</td>
<td>550</td>
</tr>
</tbody>
</table>
Open Space Policy Assessment

The site is allocated as Open Space under policy IC4 in the Proposed Submission Local Plan.

The evidence base prepared in support of the policy is the Guildford Open Space, Sport & Recreation Assessment 2016 – 2033 (June 2016) in addition to the Assessment of Sites for Amenity Value (May 2016). Together, the assessments are the primary evidence base documents produced in support of the open space policy – Policy I4 – in the Proposed Submission Local Plan.

The Open Space Sport & Recreation Assessment identifies land of public value across the borough. The assessment identifies that the site is “Accessible Natural Green Space” (brown shading on extract below). This housing typology is incorrect; this land does not meet the criteria by virtue of the fact that it is privately owned.

The Assessment of Sites for Amenity Value is an evidence base document produced in support of the open space policy IC4.

The assessment sets out a methodology to score various sites’ amenity value. The methodology assesses sites on a number of criteria as set out in Table 1 (page 8). The criteria includes: aesthetic value, access to the site, access to community facilities; access within the site; biodiversity; links to other green infrastructure; derelict or damaged land and overall amenity value.

The specific scores in relation to the above criteria are not given in the report; however the assessor’s comments in relation to the site are given as follows “Access to the site off a cul-de-sac and along an informal footpath running through the trees, sycamore dominated semi-mature trees with nice understory, some very mature oak and chestnut trees. View in and out of site”

The site came out with an amenity value score of ‘high’, this in turn led to the allocation of the site as Open Space on the Proposed Submission Proposal Map in accordance with the allocation methodology.

This assessment is however wrongly informed and therefore the evidence base is flawed in respect of this site.

Housing Delivery Policy Assessment
Strategic policy S2 seeks to deliver 13,860 units over the plan period. The annual housing targets set out in the policy have been adjusted to provide more units towards the later stages of the plan period.

The bulk of the housing is to be delivered by development in the Guildford urban area and a number of strategic sites at Gosden Hill Farm and Blackwell Farm (3,940 units, Policies A25 and A26) and the Former Wisley Airfield (2,100 units, Policy A35). These sites have been earmarked for delivery in 1-15 year period in Table 1 of the Local Plan (page 26). The Housing Topic Paper highlights that the early years of the plan are more dependent on a number of smaller sites, than a lesser number of larger sites.

**Soundness of the Plan**

**Open Space**

Open space is defined in the NPPF as land of public value which provides opportunities for sport and recreation and can act as a visual amenity.

The land allocated for open space is privately owned land with no access to the public and therefore does not provide for any sport or recreation opportunity. It is however acknowledged that, to a degree, there is some amenity value; however, this alone is not sufficient to justify the site’s allocation for open space.

Paragraph 72 of the NPPF requires that policies should be based on robust and up-to-date assessment of the needs for open space identifying specific needs and quantitative or qualitative deficits or surpluses.

The site has been erroneously identified as being public land. This has led to it being identified as suitable for assessment as open space. Upon this basis, the allocation of the site is not sound.

It is acknowledged that the site holds some amenity value. The amenity value relates to the visual appreciation of the trees lining the River Wey viewed from the north of the village; this is the only vantage point from which the trees can be fully viewed.

Although there is some amenity value, the amenity value is the only benefit the site has with regards to the recognised function of “open space” as set out in the NPPF. It has no recreational or sporting value. Furthermore, there is no prerequisite for open space to be of amenity value, the primary function is for sport and recreation, in some instance it “can act as a visual amenity”.

The amenity value of the site has been recognised through the Tree Preservation Order for the site. It is our view that the TPO is sufficient to protect the amenity value of the site. The allocation of the site for open space is therefore unnecessary and unduly restrictive. This is unsound in accordance with the need for plan to be justified based on proportionate evidence.

It is also important to highlight that the village is surrounded by Green Belt; this is land which is designated principally for its amenity value. The proposed removal of the site from Green Belt in the current plan and allocation for open space (adjoining Green Belt) is somewhat perplexing because it does not meet with the objective of allocating open space for amenity value. Open space is often allocated to provide relief from built form where it can be appreciated and is of its highest public value.

The amenity value of the site is limited due to it adjoining the Green Belt and being outside of the built-up part of the village. In addition, the site’s location on the edge of the village results in there being little distinction between amenity value of the site and the amenity value of the surrounding Green Belt. If, on the contrary, the site was accessible open space in the middle of the village distinguishable from the built form of the village, e.g. a village green, then an open space allocation would be warranted. We believe that the evidence base has failed to acknowledge this in the methodology and for this reason the policy cannot be said to be justified based on proportionate evidence.

**Housing**
7.10 Paragraph 47 requires that local authorities to ensure that their plan meets the objectively assessed housing need for housing consistent with the policies in the framework. Where an authority has a persistent record of undelivery, a 20% buffer should be added (moved forward from later in the plan period).

7.11 Guildford Borough Council has completed 728 dwellings in the past 3 years, on average less than 250 a year, and less than 300 a year over the past 7 years, failing to meet the targets carried over from the South East Plan.

7.12 In light if this record of persistent undelivery, there is no dispute that a 20% buffer should be applied. However, the local authority has made clear that it is not possible to deliver the 20% buffer along with the accrued shortfall (2,019 units) in the first five years. In accordance with the NPPF, the plan should make provision for 6,177 units in the first 5 years. As the plan has not identified sufficient land to meet with this requirement in line with the NPPF, the plan has not been positively prepared and is therefore not sound in accordance with paragraph 182 of the NPPF.

7.13 Notwithstanding the above, Guildford are unlikely to meet with the housing targets set out in Policy S2; these are staggered over the plan period. The approach of staggering the housing targets over the plan period is unsound. In reality this is only likely to exacerbate housing supply issues later on in the plan period.

7.14 The delivery of the strategic sites is vital to meeting the overall housing supply. The plan however does not specify however if these sites are to be delivered in the short (0-5 years), medium (6-10 years) or longer (11-15 years) term. The plan states they will be delivered in 1-15 years, this is not in accordance with the guidance in paragraph 47 of the NPPF.

7.15 In a wider economic context, it is important to acknowledge that the implications of Brexit on housing delivery are likely to be severe. There are a number of factors that are likely to have an impact on housing delivery, these issues are most likely to manifest in the delivery of large-scale strategic sites being developed by national house builders. For these reasons we believe that more emphasis should be placed on the identification of small-medium sized sites in addition to the allocation of additional strategic sites.

7.16 With regards to housing the plan is not effective; it is not deliverable over the plan.

To this end, it is not sound.

Use of Evidence Base

7.17 Paragraph 167 of the NPPF states that wherever possible the local authority should consider how the preparation of an assessment will contribute to the plan’s evidence base. It requires that the process should start early in the plan-making process and key stakeholders should be consulted in identifying issues.

7.18 With regards to the assessments that have informed the open space policy, i.e. the Guildford Open Space, Sport & Recreation Assessment 2016 – 2033 (June 2016) in and the Assessment of Sites for Amenity Value (May 2016), their preparation has not been in accordance with national planning policy.

7.19 These assessments were published in May and June 2016. These then informed policies which were included in the Proposed Submission Local Plan for the first time upon its publication in June 2016.

7.20 The open space allocations were not in the previous iteration of the Local Plan and, as such, this did not give interested parties an opportunity to comment on these policies or indeed any time to prepare any rebuttal to these designations with supporting evidence, for example, an arboricultural survey, ecological survey, open space assessment or landscape and visual impact assessment. The opportunity to provide such evidence would have provided a more robust evidence base and a sounder basis for allocation.

7.21 To this end, the plan is not justified and has not been considered against other alternatives or based on proportionate evidence. This is clearly an unsound approach to plan making.

**Recommended Modification of the Plan**
Due to the open space designation being unsound, it is respectfully requested that the Inspector removes the open space allocation from the site. With specific regard to the site, the open space designation is not necessary with the existing TPO.

Notwithstanding any inaccuracies in the evidence base, the process of allocating open space commenced too late in the plan making process. We are therefore also of the view that the entire open space allocations should be re-consulted upon.

If the Inspector is of the view that the open space allocation is justified, the applicant would like to recommend a modification to the allocation.

The modification would involve the decreasing the size of the open space allocation to the area shown on the site layout plan (Appendix 1). This would comprise a 1ha strip of open space along the northern boundary of the site. This would retain the trees which contribute to visual amenity.

This modification would also be compatible with the development of the inner parts of the site. Should any application for development be made on the site; the Send Surrey Ltd could consider making this strip of land accessible to the public, to be used as public open space (although the site would be held by Send Surrey Ltd). This would significantly improve the function of the area as open land, however this will only be achievable if delivered as part of a housing development and any such development will only be feasible if the proposed open space allocation for the site is removed.

The plan does not provide sufficient land for housing to meet the objectively assessed need as required by the NPPF. We recommend that the plan is re-consulted upon and further sites identified to meet the housing supply requirements consistently over the plan period. The current approach is not sound and is likely to exacerbate housing supply issues later on in the plan period.

In addition, the housing targets are have been modified so that the local authority has some prospect of maintaining a 5YHLS, however, in doing so, this will stop development coming forward on the basis of there being no 5YHLS. This again, will exacerbate housing supply issues later on in the plan period.

Allowing housing application to come forward and be assessed in accordance with the presumption in favour of sustainable development in the absence of a 5 year housing land supply is an important function of the NPPF with regards to boosting the supply of housing. Staggering the annual housing to avoid such a circumstance prevailing is counterproductive as it restricts this key function of the NPPF to boost supply. Therefore we believe the housing targets must be annualised over the plan and recommend this as a modification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Send Surrey Ltd PSLP Response Statement1.jpg (69 KB)
- Send Surrey Ltd Indicative Site Layout.pdf (294 KB)
- Send Surrey Ltd PSLP Response Statement2.jpg (70 KB)
- Send Surrey Ltd PSLP Response Statement.jpg (68 KB)
1 Introduction

1.1 Future Planning & Development provide planning advice to our client Send Surrey Ltd in respect of their site Land off Heath Drive, Send, Woking, Surrey, GU23 7EP (‘the site’).

1.2 This Statement has been prepared in response to Guildford Borough Council’s Proposed Submission Local Plan (‘the Local Plan’) consultation (Regulation 19) which ends on 24 July 2017. The current consultation is effectively an update to the Regulation 19 consultation, in July 2016, to which Send Surrey Limited made representations. The July 2016 representations are provided in Appendix 1.

1.3 The updated Regulation 19 Local Plan carries forward the site’s draft Open Space allocation. Our previous Regulation 19 consultation response made the case that this draft allocation was not sound in accordance with the guidance in the National Planning Policy Framework (NPPF). Our representations also made the case that the Local Plan was not sound because it did not allocate sufficient land to meet with the identified housing need in the borough.

1.4 This Statement provides an update with regards to the two main topic areas: Open Space and Housing. Firstly, the statement presents further evidence to demonstrate that the draft Open Space allocation has been wrongly applied. This includes an Opinion from Andrew Tabachnik QC which states that the Open Space allocation is “unequivocally inappropriate and unlawful”. Secondly, the statement presents evidence to demonstrate that the site is deliverable for housing; this includes evidence to demonstrate that any potential site constraints, i.e. ownership, access, trees and ecology, will not impede the delivery of the site. This is also supported by a pre-application response from Guildford from July 2017 that confirms that the principle of residential development is acceptable. Accordingly, both topics will be addressed in the following sections.

2 Grounds for Draft Open Space Allocation to be Removed

2.1 Open Space is defined in the NPPF as:
“All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity”

2.2 Paragraph 72 of the NPPF states “Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required”.

2.3 The site was initially proposed to be allocated as Open Space under policy I4 in the Submission Version Local Plan (Regulation 19) in 2016. This draft allocation was justified by the evidence prepared in support of the policy, this being the Guildford Open Space, Sport & Recreation Assessment 2016 – 2033 (June 2016) in addition to the Assessment of Sites for Amenity Value (May 2016).

2.4 The evidence base studies have been updated following the previous Regulation 19 Consultation. The Assessment of sites for Amenity Value 2017 was published in June 2017 and the Guildford Open Space, Sport & Recreation Assessment 2017.

2.5 The allocation of the site under Policy IC4 (renamed from I4) remains in the current updated Submission Version of the Local Plan.

2.6 The site has been reclassified as “private space” in the Open Space, Sports and Recreation Assessment. This indicates that it has no open space value for recreation. As such, we understand that the site is only allocated as open space for its amenity value. This was confirmed by the officer dealing with open space policy (Mr Dan Knowles) in an email to Send Surrey Limited on 8 May 2017 (Appendix 2).

2.7 The site is only allocated as Open Space for its amenity value. Fundamentally, this is not in accordance with national planning policy because it does not meet with the purpose of allocating land as Open Space.
2.8 Send Surrey Limited obtained advice from Counsel in February 2017. Our Barrister - Andrew Tabachnik QC - has provided his Opinion on the draft Open Space allocation; this is attached in Appendix 3.

2.9 Andrew Tabachnik QC concludes his Opinion as follows:
“I have no hesitation in concluding that the draft allocation of the Site as “open space” is inappropriate and unlawful. The Site does not fulfil the requirements set out in the NPPF, and the evidence base relied upon was materially flawed”

2.10 Notwithstanding the fundamental fact that the site does not accord with national planning policy, it is also clear that the allocation of the site for its amenity value is unnecessary. The Open Space allocation adds another policy designation simply to satisfy the deficiency in open space provision in Send identified in the evidence base.

2.11 The 2017 amenity assessment indicates that the site is of ‘medium’ value and comments that “Partial development could retain and potentially improve amenity value” (page 139). The amenity value has been downgraded from ‘high’ in the 2016 assessment to ‘medium’, we assume on the basis that the site has been correctly identified as being private land (the site was incorrectly identified as public land in the 2016 evidence base documents).

2.12 It is also important to note that that the site’s assessment methodology which is set out in the Amenity Audit Spreadsheet has not been made available to Send Surrey Limited. A request to obtain a copy of this was denied by the Council. We therefore request that the Inspector makes this document available at Examination.

2.13 The analysis of the results in Section 5 of the assessment states:

A number of sites scored either Medium or High for their amenity value, and it is these sites which should be protected as Open Space. A number of sites that scored Medium or High may not require protection as Open Space because their amenity value could be retained or enhanced if the site is developed (or only partially developed).1

2.14 The amenity value of our site could be retained or enhanced if the site is developed. The site is clearly developable, and therefore, in accordance with this guidance, it does not require protection as open space. This is further evidenced by the fact that Send Surry Limited has received pre-application advice from the Council to state that the site is developable subject to retaining the features of amenity value (Appendix 4).

2.15 Furthermore, the site is covered by a group Tree Preservation Order (TPO). This, in itself, protects the features which provide the site’s amenity value, the trees. The TPO is given in Appendix 5.

2.16 Whilst on its own merits the site has some amenity value; this amenity value can only be appreciated in the wider context of the surrounding area. The allocation of open space for amenity value can be justified in built-up or densely populated areas where open space provides visual relief and ‘breathing space’. In this instance however, there is no need for an open space designation. The site abuts the Green Belt on the northern boundary, beyond this boundary there is open countryside, a vast expanse of open space. There is no need to allocate a parcel of land on the edge of the Green Belt as open space. Additionally, the site is on the side of the village, therefore its openness cannot be appreciated; it simply appears to be the edge of the village. Open space should only be designated for amenity when it is in an appropriate location which allows it to be appreciated as such, i.e. a village green.

2.17 Allocating the site for amenity value in this instance is incorrect. It is not central to the village; the visual interest and/or visual relief it provides to residents is very limited; it is not distinguishable by virtue of the fact it lies on the village edge and it abuts the Green Belt which is a vast expanse of open countryside whereby the inherent characteristic is openness.

2.18 Taking into account the above reasons and the group TPO, the allocation of the site for open space on the basis of its amenity value alone is both unsuitable and unnecessary.

4 Summary of Further Recommended Modification of the Plan

4.1 This Statement has provided further evidence to support the removal of the draft Open Space allocation of the site in the Submission Version Local Plan and also to have the site assessed as a housing allocation.
4.2 The evidence presented with regard to the Open Space allocation is unequivocal in that the proposed allocation is inappropriate and unlawful.

4.3 The allocation of the site on the basis of its amenity value alone cannot be justified. Furthermore, the allocation of the site for its amenity value alone is both unsuitable and unnecessary. It is unsuitable because the site is located in an area which does not provide any benefit as open space being on the edge of the built-up area and adjoining Green Belt. It is unnecessary because the existing group TPO is sufficient to ensure that the amenity value of the site, i.e. the trees, is protected.

4.4 With regards to the consideration of the site as a housing allocation, this Statement has demonstrated that there are no over-riding constraints to stop the site being delivered for housing in the short-term. A residential development could proceed on site with suitable access and no harmful impact on trees or biodiversity subject to mitigation measures.

4.5 It has also been demonstrated, with regards to housing, that the site could provide a policy compliant amount of affordable housing and could also provide a housing mix to meet the identified need in the SHMA. The site could also deliver sufficient affordable housing to meet with the current local housing need at ward level.

4.6 The reasons set out in this Statement, it is respectfully requested that the draft Open Space allocation is omitted from the next version of the Local Plan. It is also requested that the site is considered for housing development in accordance with the evidence submitted.

1 http://www.guildford.gov.uk/newlocalplan/CHandler.ashx?id=24663&p=0 (Section 5 - . The Assessment of sites for Amenity Value 2017)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Local Plan Representation - Send Surrey Limited - Part 2 of 2.pdf (9.8 MB)
Local Plan Representation - Send Surrey Limited - Part 1 of 2.pdf (4.8 MB)

Comment ID:  pslp171/3269  Respondent:  15672545 / Future Planning & Development (Garry Hutchinson)  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3 Grounds for Allocation of the site for Housing

3.1 Our initial representations from July 2016 made clear that the Local Plan had failed to suitably plan to meet the borough’s identified housing need over the plan period. A number of shortcomings were identified. The principle issue was the persistent under delivery of housing which has resulted in a significant short-fall and the fact that a 20% buffer was not applied in accordance with the NPPF. Additionally, the Local Plan failed to identify when strategic sites will be delivered and it also made modifications to the housing supply trajectory which sought to mask the acute housing land supply issues which were not addressed by allocating enough sites for housing.

3.2 It is not unreasonable to assume that the housing supply situation in the borough has worsened since the end of the previous consultation in July 2016. However, rather than reassess this situation, this statement seeks to provide evidence to demonstrate that the site can deliver much needed housing for the borough in the short-term (0-5 years).
3.3 In parallel with the promotion of the site through the Local Plan preparation, Send Surrey Limited have also obtained pre-application advice from the Council pursuant to obtaining outline planning permission for a development of 53 residential unit development on site.

3.4 A pre-application meeting was held in April 2017 at the Council’s offices and the follow-up advice was received in July 2017. The pre-application advice confirmed that the principle of residential development on the site was acceptable. The pre-application noted that the number of units would need to be significantly reduced from 53 to ensure that the site retains its amenity value.

3.5 The pre-application scheme was informed by a number of supporting documents. This evidence, and other information pertinent to the deliverability of the site, is described under the respective headings.

   a) Trees

3.6 A principle area for assessment was trees. A Tree Survey was undertaken in December 2016, this is provided in Appendix 6.

3.7 The Tree Survey focused on the developable area within the centre of the site, with a tree buffer retained along the northern and western boundary of the site to maintain amenity value. The survey found that the majority of the trees were Category C (trees of low quality).

3.8 A Tree Constraints Plan was prepared to establish the developable area of the site; this is given in Appendix 7. The plan identified a developable area of 1.54ha in the central part of the site. The Tree Constraints Plan was then used to inform a revised Site Layout, this is provided in Appendix 8.

   b) Access

3.9 Following the preparation of the revised Site Layout, a Tree Impact Plan was prepared, this is given in Appendix 9. This identified that only one potential issue (as highlighted on the Tree Impact Plan) with the proposed access road and associated footway positioned within the RPAs of trees 74 & 75. Although the proposed access road would be within the RPA of these trees a solution is noted and could be designed out at the detailed design stage, subject to Highways approval.

   c) Ecology

3.10 A Preliminary Ecological Appraisal was undertaken by Urban Edge Environmental in January 2016, this was updated in July 2017 following further surveys see Appendix 10. A Reptile Survey was completed in July 2017, this is provided in Appendix 11. A Invertebrate Survey was also completed in July 2017, this is given in Appendix 12.

3.11 There are no over-riding ecological constraints on the proposed development as detailed in the initial findings of the surveys. Further surveys will be undertaken during the appropriate seasons and recommended mitigation measures will be implemented at the appropriate stage of any development.

3.12 Subject to the final survey results, the development proposals will be updated to take advantage of any opportunities for ecological enhancement. For example, there might be an opportunity to provide an ecological benefit for otters and voles through re-profiling of the river banks or scrub clearance, both of which will improve their habitat.

   d) Site Ownership

3.13 The site is being promoted by a single company called Send Surrey Ltd (registered number 10173245). The company intends to development the site for housing. The site is available, viable and deliverable for housing in the short-term (0 – 5 years).

3.14 A single title (for Send Surrey Limited) is currently being formalised. This will be supplemented by an agreement signed by all landowners.

   e) Meeting Identified Housing and Affordable Housing Need
3.15 The Indicative Layout submitted with the representations in July 2016 proposed a layout for 40 units; this comprised a mixture of detached and semi-detached housing.

3.16 Following the Tree Survey and Tree Constraints plan, a revised layout for 53 units was prepared within the 1.54ha developable area (see Appendix 8).

3.17 The Local Plan Proposed Submission Policy H2 provides guidance on affordable housing. It requires affordable housing of 40% on all sites over 0.17ha. The tenure and size of affordable homes must contribute towards meeting the mix of affordable housing needs identified in the joint West Surrey Strategic Housing Market Assessment 2015 (SHMA) or subsequent affordable housing needs evidence. This currently includes a tenure split of at least 70% rented, with the remainder being other forms of affordable housing.

3.18 In accordance with the draft policy, any residential development will provide 40% affordable housing. The housing mix will respond to needs identified through the SHMA in the context of the physical constraints of the site. The Revised Site Layout was prepared in accordance with the recommendations of the SHMA.

3.19 The key findings of the SHMA relevant to the site are summarised as follows:

- For affordable housing the focus should be on smaller properties, whilst recognising that one-bed properties have limited flexibility to changing household circumstances and therefore a higher turnover of occupants. For affordable houses there is a need for 40% one bedroom, 30% two bedroom, 25% three bedroom and 5% four bedroom affordable homes (page 131).
- There is a need for 455 affordable homes in Guildford per year (page 102), to meet the existing backlog and arising need (at a 30% income threshold).
- For market accommodation the focus of provision should be on smaller family housing. The recommended mix is for 10% one bedroom, 30% two bedroom, 40% three bedroom and 20% four bedroom market homes (page 132).

3.20 In accordance with the findings of the SHMA, an indicative housing mix is proposed in accordance with the identified need.

3.21 An affordable housing policy and SHMA compliant mix is given as follows:

<table>
<thead>
<tr>
<th>Tenure</th>
<th>One Bedroom</th>
<th>Two Bedroom</th>
<th>Three Bedroom</th>
<th>Four Bedroom</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rent</td>
<td>130</td>
<td>70</td>
<td>213</td>
<td>44</td>
</tr>
<tr>
<td>Rent</td>
<td>10</td>
<td>30</td>
<td>40</td>
<td>20</td>
</tr>
</tbody>
</table>

3.22 The proposed indicative housing mix is given as follows:

<table>
<thead>
<tr>
<th>Tenure</th>
<th>One Bedroom</th>
<th>Two Bedroom</th>
<th>Three Bedroom</th>
<th>Four Bedroom</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rent</td>
<td>130</td>
<td>70</td>
<td>213</td>
<td>44</td>
</tr>
<tr>
<td>Rent</td>
<td>10</td>
<td>30</td>
<td>40</td>
<td>20</td>
</tr>
</tbody>
</table>

3.23 As can be seen from the table above, the proposed indicative housing mix is fully compliant with the affordable housing requirement of 40% and also the identified housing need from the SHMA. This is a significant benefit of the scheme.

f) Meeting Identified Local Affordable Housing Need

3.24 Given the wide ranging nature and strategic recommendations from the SHMA, further research was undertaken to find out the affordable housing need at ward level, i.e. Send ward.

3.25 There are 22 people on the Housing Register in the ward of Send. The housing needs are as follows: 1 bedroom need = 13; 2 bedroom need = 7 and 3 bedroom need = 2.

<table>
<thead>
<tr>
<th>Tenure</th>
<th>One Bedroom</th>
<th>Two Bedroom</th>
<th>Three Bedroom</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rent</td>
<td>130</td>
<td>70</td>
<td>213</td>
</tr>
<tr>
<td>Rent</td>
<td>10</td>
<td>30</td>
<td>40</td>
</tr>
</tbody>
</table>

3.26 Although the Housing Register is subject to change and the information provided only provides a snapshot of a certain point in time, i.e. January 2017, it is particularly relevant to show that the proposal would almost fully meet the current identified local affordable housing need.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: ![Local Plan Representation - Send Surrey Limited - Part 2 of 2.pdf](9.8 MB)  
![Local Plan Representation - Send Surrey Limited - Part 1 of 2.pdf](4.8 MB)

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPA16/4195</td>
<td>15672737 / Andrew Mills</td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any reclassification of the village boundaries, enlarging the villages of East and West Horsley will have a significant and damaging effect to the existing village life, village characteristics and property values. Having purchased my property in the last five years specifically within a village green belt setting (for which I paid the various search fee’s etc) I was told that I was safe from any future building proposals due to the green belt protection and restrictions. I will investigate all means of recovering any costs for damage to either the existing building structure or future property value along with a refund of all search costs.

I object to any removal of the existing village boundaries from the green belt. Having purchased my property in the last five years specifically within a village green belt setting (for which I paid the various search fee’s etc) I was told that I was safe from any future building proposals due to the green belt protection and restrictions. I will investigate all means of recovering any costs for damage to either the existing building structure or future property value along with a refund of all search costs. GREEN BELT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>Respondent</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSLPS16/7767</td>
<td>15672737 / Andrew Mills</td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the number of proposed buildings and building sites in general. Whilst I understand there is a need for local housing these villages should be considered separately from any ‘country wide’ suggestion, they are unique and require individual consideration. If the Wisley Airfield site goes ahead this will already add 2000+ homes within 2 mile radius of the existing villages? More homes and sites would just be a further assault on the current village infrastructure. If Wisley Airfields is to be one of the sites then I would object to any further building within at least 5 mile radius.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed building sites for Manor Farm, West Horsley. The current village infrastructure and road system is already under strain from individual building projects. The traffic alone from these proposed new sites will be extremely damaging to the village environment, the safety of the residents and existing dwellings along the routes that will be used by building plant traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the proposed building sites for Ockham Road North, East Horsley. The current village infrastructure and road system is already under strain from individual building projects. The traffic alone from these proposed new sites will be extremely damaging to the village environment, the safety of the residents and existing dwellings along the routes that will be used by building plant traffic. My house already vibrates and shakes when existing building traffic passes along Ockham Road North.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the proposed building sites for Ockham Road North, West Horsley. The current village infrastructure and road system is already under strain from individual building projects. The traffic alone from these proposed new sites will be extremely damaging to the village environment, the safety of the residents and existing dwellings along the routes that will be used by building plant traffic. My house already vibrates and shakes when existing building traffic passes along Ockham Road North.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the proposed building sites for East Lane, West Horsley. The current village infrastructure and road system is already under strain from individual building projects. The traffic alone from these proposed new sites will be extremely damaging to the village environment, the safety of the residents and existing dwellings along the routes that will be used by building plant traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

East and West Horsley and much of the local area enjoy significant numbers of visitors, on foot, by car and more often on bikes; these proposals will destroy the area as we know it whilst putting the lives of visitors and residents at risk. This should NOT be allowed to happen. Please reconsider your justification for the New Plan in its entirety along with the damage and inconvenience to existing residents, please do NOT let this happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17206  Respondent: 15672737 / Andrew Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I fear if these proposals are passed as is there will have a significant and negative impact which would lead to irrevocable damage. This is not about need but much more about greed and the council being blinded by the opportunity to increase income at the cost of all existing residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1921  Respondent: 15672737 / Andrew Mills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
After long and careful consideration to the proposed Guildford Borough Council ‘New Local Plan’ I would like to OBJECT strongly to a number of the council’s recommendations. If you continue with the new plan in full you will destroy and erode an area that by the councils own admission is considered an area of natural beauty? Why?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4212</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the housing number of 693 houses per year from the West Surrey SHMA is far too high. The calculations are not transparent and therefore not verifiable. I cannot support this document and object to its use in any form and its inclusion in the evidence base.

I object to the fact that insufficient consideration has been made for the constraints in this borough, be they infrastructure in nature, AONB, THBSPA, Green Belt, water supply etc.

I object to the significant use of the green belt for site allocations. I object to any allocation being made before a housing number has been accepted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4220</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the use of inferior, inadequate and subjective documents in the evidence base.

In particular I object to the LAA, which is inconsistent in the extreme and incomplete, citing for example land considered for schools which has not been considered for housing despite being brownfield, in excess of 50ha and close to the railway. [eg site at Newmarsh Farm East Horsley – clearly brownfield due to lack of enforcement]. It is also highly subjective and open to challenge.
I object to the Borough Infrastructure Delivery Plan, which is incomplete, lacking in detail, not properly costed eg £5-£10 million or even worse £100-£250 million and relies on funding that is not allocated by central government and is more of a wish list than anything else.

I object to the use of the Green Belt and Countryside Study in all its volumes and addenda. Why is it that some sites are excluded because they weren’t identified in the Green Belt and Countryside Study despite numerous volumes and addenda? Why is it that some sites may impact the TBHSPA when they are outside the 5km zone are excluded (nothing to do with the size of site) and some sites are inside and indeed outside the zone but included? (again not to do with the size of site). It just appears to be inconsistent and subjective – quite possibly a desk-based study which has not been verified or cross-checked. This is unacceptable.

I object to the fact that modern building techniques appear to have been ignored such that there is almost no housing proposed for the town centre “due to flood risk”. In many other parts of the country this risk has been completely mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4219  Respondent: 15673185 / Simon Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposal for new greenbelt in Ash and Tongham (this is not the Guildford Green Belt it is the Metropolitan Green Belt and you cannot get further from London in the borough than Ash and Tongham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4216  Respondent: 15673185 / Simon Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the insetting of Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4218</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the insetting of Send

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4217</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the insetting of West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4213</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the allocation of land at Ockham Road North, WH – allocation A40

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4215  Respondent: 15673185 / Simon Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7789  Respondent: 15673185 / Simon Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that there is no evidence that the impact of nitrogen and acid deposition on the heathland and the consequent degradation of the heathland has been taken into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7790  Respondent: 15673185 / Simon Jefferies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the fact that the plan implies modal shift to cycling and walking which in the rural areas is completely unrealistic due to lack of proper cycle lanes on local roads (and the space to provide them). This plan disenfranchises the elderly, the young, the unwell and the disabled.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPS16/7791  Respondent: 15673185 / Simon Jefferies  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to all sites in West Horsley for over 5 homes. There is insufficient infrastructure planned. It is impossible to deliver sustainable housing sites of this size in the countryside. These sites will merge the villages of Ockham, West and East Horsley creating URBAN SPRAWL.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPS16/7796  Respondent: 15673185 / Simon Jefferies  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the allocation of Thatchers’ Hotel, EH.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPS16/7793  Respondent: 15673185 / Simon Jefferies  Agent:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7794</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the allocation of Bell &amp; Colville, WH – allocation A37</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7797</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the allocation of land at Ockham Road North, EH</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7792</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the allocation of land at East Lane, WH</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the allocation of Manor Farm, WH - allocation A38</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17240  Respondent: 15673185 / Simon Jefferies  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>It is clear from the census that building the majority of new housing on the greenbelt will generate almost double the amount of cars than building housing in the urban area. This is unsustainable.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17247  Respondent: 15673185 / Simon Jefferies  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object due to the impact of large numbers of additional residents on local policing facilities which will be further overwhelmed. Surrey Police are currently unable to cope with dealing with local residents’ concerns [eg breach of law on PROWs on allocation A35] citing lack of resources.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
<tr>
<td>Comment ID: PSLPP16/17245</td>
</tr>
<tr>
<td>--------------------------</td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object due to the unsuitability of our local roads for heavy vehicles and more traffic including many years of construction traffic</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17242</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the fact that the plan implies modal shift to cycling and walking which in the rural areas is completely unrealistic due to lack of proper pedestrian footpaths on local roads and the requisite street lighting to ensure the safety of users. Much of the borough is RURAL IN NATURE and residents specifically do not want to live in well-lit areas more akin to urban living.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17248</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the impact of large numbers of new residents on school places which has not been properly planned. For example, Send Primary School (in the process of being rebuilt) is being rebuilt with no spare capacity. The proposed redevelopment of the Raleigh School in Horsley [not even in the local plan] is only for redevelopment not for enlargement. Schools planned for Three Farms Meadows will not be operational for the first 500 houses of development. Where will those children go to school? There is no capacity. When the school is built at A35 children will have to be bussed in from elsewhere as it’s not possible to walk… adding to congestion on local roads and the Strategic Road Network

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17241  Respondent: 15673185 / Simon Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure planning for sites has not been properly addressed. There is a huge infrastructure deficit. Sites which will rely on the private car must be excluded from the local plan. Unrealistic transport plans put forward by developers need to be rejected.

I object to the fact that many of the allocated sites are being planned in unsustainable locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17246  Respondent: 15673185 / Simon Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of consideration for the protection of heritage assets. There appears to be no recognition that the number of HGVs used during major construction either of infrastructure or housing has a huge negative impact on listed buildings due to shaking foundations and increase in pollution [and impact on brickwork/mortar etc].

I object due to the inadequate protection of the environment in terms of wildlife, SNCIs, SPA; in terms of air pollution and noise and light pollution.
I object due to the fact that local healthcare facilities will be overwhelmed by large numbers of additional residents – it is already difficult to get an appointment at the GP and the RSCH is failing to meet waiting times for outpatients’ appointments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17238  Respondent: 15673185 / Simon Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the overdevelopment of sites particularly those outside the urban area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17252  Respondent: 15673185 / Simon Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of villages from the greenbelt. This is not necessary. There is plenty of suitable land in the urban area which needs to be regenerated rather than left to degrade further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17239</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the fact that insufficient consideration has been given to the harm caused by over-development to the Special Protection Area, the Sites of Special Scientific Interest and the borough’s Conservation Area and heritage assets.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17250</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the fact that air quality concerns have not been taken seriously – air quality in many parts of the borough is in excess of the EU permitted levels. Additional traffic will exacerbate this situation impacting the health of all current and future residents.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17250</th>
<th>Respondent: 15673185 / Simon Jefferies</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the proposed Strategic SANG allocation at Long Reach, West Horsley as it “supports” the development of close to 1000 additional homes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/17237  Respondent: 15673185 / Simon Jefferies  Agent:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate size of sites relative to the historic rural villages they will ruin.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17243  Respondent: 15673185 / Simon Jefferies  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
</tbody>
</table>

I object to the impact of excessive development on the already congested Strategic Road Network particularly on the A3 and M25

I object to the fact that there is no tolerance planned at all for accidents, roadworks etc on the SRN which already impact local roads often resulting in gridlock.

I object to the fact that this proposed plan does not meet the needs of local communities.

I object to the fact that insufficient truly affordable housing is being proposed. There is no evidence that any calculations at all have been done; no sensitivity analysis on interest rates; costs of running cars etc.

I object to the impact of further congestion on local village roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17249  Respondent: 15673185 / Simon Jefferies  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft plan which proposes over 70% of new housing on the greenbelt. This will ruin the countryside for ever impacting both current and future residents.

I object to the allocation Three Farms Meadows – allocation A35. I object to the proposed removal of this site from the green belt when no exceptional, very special or special circumstances exist. GBC Planning Committee’s unanimous rejection of an almost identical proposal less than six months ago, despite being couched in terminology which was aimed at removing many of their objections if the site were to be removed from the greenbelt must be considered particularly as any removal from the greenbelt must demonstrate very special circumstances and this plan does not. I therefore strongly object due to:

1. Unsustainable nature of site reliant on private cars and undeliverable public transport [in terms of unrealistic journey times/fabricated modelling which do not stand up to scrutiny]
2. Unrealistic assumptions that people will even walk from one end of the development to the other to go to the doctor, school, shop etc.
3. Unsustainable due to poor air quality impact on both housing and the SPA
4. Impact on views to and from the Surrey Hills AONB
5. The urban nature of the proposal – five storey buildings are out of keeping in the countryside [and some would argue are not even acceptable in Guildford town centre]
6. Road, sewerage, fresh water, gas and electric capacity does not exist.
7. Funding for infrastructure from Central government does not exist;
8. There is already a huge infrastructure deficit in terms of roads. This is not properly taken into account.
9. Impact on nitrogen deposition on the TBHSPA is not neutral and this allocation is therefore open to legal challenge.
10. No consideration has been taken of the current and future plans of the RHS Wisley. These should take priority over allocation A35. Roads definitely cannot accommodate an additional 500,000 visitors to the RHS and 5,000 residents of site A35. [this is without taking into consideration the huge number of houses planned in the Horsleys, Send and Ripley].
11. Robust objections to the planning application almost identical to this allocation were made by numerous statutory bodies including neighbouring Local Authorities.
12. Insufficient consideration has been taken of the historic houses in Ockham and Ripley and the Chatley Heath Semaphore Tower

I object to the allocation at Garlick’s Arch – allocation A43 due to the loss of ancient woodland; the impact on all local infrastructure of another 400 houses; the site is too close to the A3 and will have poor air quality. The SRN is meant to be for THROUGH TRAFFIC not local traffic. Numerous junctions will slow progress for all users and increase accidents due to more lane changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17244  Respondent: 15673185 / Simon Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of consideration of parking issues in local villages caused by larger population

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5215  Respondent: 15673185 / Simon Jefferies  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I endorse in full the comments made by Ockham Parish Council and also those by the Wisley Action Group. I understand that the Richard Harwood QC, retained by OPC and WAG has advised that the Council should not be undertaking a Regulation 19 consultation. I find it insulting that the Council appears not to understand the process under which it is meant to operate.

Additionally, I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. By virtue of its location residents will be reliant on the motor car, any assumption that the infirm, elderly and the young will walk or cycle to work, health facilities, shopping etc is clearly nonsense. I also have no confidence that those who do not fall into the above categories will use sustainable methods to get about. As a medic I am exposed on a daily basis to the sedentary nature of today’s population in the UK and any ambition of converting the population to a bunch of fitness fanatics is very wide of the mark. [see increases in diabetes, heart disease etc]
4. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10)
5. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
6. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
7. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
8. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

• The associated traffic increase from the RHS has not been taken into account.
• The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
9. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

10. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

11. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

12. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

13. Opportunity (3) should be common to all sites and is not unique to this site.

14. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

15. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

16. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

17. I object to the removal of additional 3.1 ha from the green belt without any justification.

18. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

19. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

20. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

21. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

22. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

23. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

24. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

25. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

26. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

27. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

28. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

29. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
30. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

31. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

32. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

33. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

34. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

35. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

36. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

37. I object to the plan period being inconsistent. This is an example (of which there are many) of extremely sloppy work which gives me no confidence in the content. For example, the foreword mentions an end date of 2034 whereas the introduction 1.2 and 1.3 refer to 2033. Spatial vision uses 2033. What is the plan period? This is very unclear.

38. Para 2.10a underestimates the pressure already suffered by local residents on a daily basis as a result of insufficient infrastructure particularly in the provision of health services, e.g. doctors and hospital appointments. Additional growth in the quantum proposed is unsustainable in that it fails to recognised the needs of current residents and is focussed only on the needs of future residents.

39. Para 2.13 I reject the statement that most local roads in villages have “at least one footway and usually two “.

40. I reject the assumption in para 2.15 that increased road infrastructure capacity – it may improve theoretical capacity but actually worsens performance.

41. I object to the new green belt provision in Ash and Tongham to prevent the merger with Ash Green and I do not understand why this locality should be treated any differently from any other location for example the merger of Ripley and Ockham as a result of policy A35.

42. I object to the fact that the spatial vision makes no mention of protecting the TBHSPA

43. I reject the comment in the spatial strategy that the RIS will provide congestion relief for the A3 in Guildford as my understanding is that these schemes have been dropped.

44. I do not accept para 3.2 where there is a disconnect in the period of the Council’s Corporate Plan and the Submission plan –

45. I object to Para 4.1.11which should clearly identify the version of the LAA and not just refer to “the latest”.

46. I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.
47. I object to the wording of 4.2.18 which is unenforceable. Throughout the plan the word “Expect” needs to be replaced by “require”

48. Likewise, I object to the use of the word “resist” in 4.2.24 – it should be replaced by “refused” in this para and throughout the plan.

49. I object to the wording of policy H2 specifically “we will also seek” and “we will seek”. This should be replaced by the use of the verb “require” in this para and throughout the document.

50. Policy H2 para 4 needs to include that any funds paid in lieu of affordable housing should be ringfenced and the wording further tightened by replacement of “expect” by “will enable”

51. I object to policy H3 para b “the local community”. Rural exception sites should only be allowed where the identified need is truly local defined as within the parish.

52. I object to policy P2 and the inclusion of Ripley in the list of villages to allow insetting.

53. Policy P2 refers to the Metropolitan green belt yet goes on to create additional green belt in the west of the borough furthest from the metropolitan area. There is no justification whatsoever for new green belt land in Ash.

54. There is no evidence that cross-boundary options beyond the green belt have been considered as a viable option instead of moving the green belt boundaries within the borough.

55. I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.

56. I strongly object to policy P5 TBHSPA as no regard whatsoever is paid to the impact of air pollution on the integrity of the heathland and the resultant loss in habitat from nitrogen deposition. It is inconceivable that the level of development proposed in this plan will result in anything other than thousands more vehicles on the roads due to the unsustainable locations of for example policy A35. Additional traffic equals more pollution and more nitrogen deposition. There is no evidence at all of any in-combination impact from planned developments in adjacent boroughs and no regard to the recent Wealden case for example.

57. I also reject that the SAMM mitigation through the use of wardens will have any impact on cat predation.

58. I object to the statistics in para 4.3.55. Any survey work done on the visitor numbers is unlikely to have covered the time when commercial dog walkers from South London who appear in droves throughout the week.

59. I object to para 4.3.57 – there is no evidence that SANG provided adjacent to the SPA will provide any mitigation at all. Faced with the choice of walking in a manmade environment or on the SPA, the majority of people would choose the natural environment.

60. I object to para 10 of policy E1. Where is the “new industrial employment land on the west side of the former Wisley airfield”? there is no “new” employed land listed under policy A35. This is confusing and needs to be clarified.

61. I do not understand why previously developed sites in the green belt have not been included for development. Specifically, HMP Send where the prisoners have been told that they might be moving and indeed the site is understood to have been valued by Savills amongst others. There is no justification for adjustment of green belt boundaries until all other options have been exhausted. Doubtless there are other examples.

62. I object to para 4.4.36 with regard to the extension of the Surrey Research Park. There is no justification for this when there are a number of surface car parks within the Research Park which should be used in preference. The density of buildings in the Research Park needs to be prioritised over an extension in area.
63. I object to the wording of para 5 in policy E5 – “marketing of the site for its current use for a minimum of 12 prior to submission of a planning application”. I do not understand what this means so how can I be consulted properly.

64. I object to policy D1. This policy will be unenforceable due to the deletion of the word “must” in para 2. The word “must” needs to be retained.

65. I object to the deletion of the wording in para 2 of policy D1 which must remain in full and I also object to the deletion of para 4.5.8.

66. I agree with the insertion of para 4.5.8a regarding the need for an efficient broadband connection but would add that the needs of current residents should take precedence. The state of broadband provision in parts of the borough (e.g. Ockham) is frankly dire.

67. I support the inclusion of policy D4.

68. In Guildford borough, it is widely accepted that there is an infrastructure deficit particularly in roads and the provision of health services. The needs of current residents are not taken into account in policy ID1. All infrastructure should be in place before development of strategic sites takes place to ensure that the developer pays so as not to jeopardise the needs of current residents. Indeed, I understand that the withdrawal of the objection from Highways England is contingent on infrastructure in advance.

69. There is insufficient weight given to the problem of air pollution in the borough. I object strongly to the fact that the Council does not take the health of its residents sufficiently seriously to have a policy to ensure the improvement of air quality in the life of the plan.

70. I object to the wording of policy ID3 para 11 which makes no sense at all. What do you mean by “the provision of additional public off-street parking in Guildford town centre will be supported when it facilitates the interception of trips that would otherwise derive through the Guildford gyratory”.

71. I object to the continued assumption that Guildford needs more retail. The ELNA fails to understand the shortcomings in the Carter Jonas retail study update 2017 which refers to retail requirement from companies already in administration and also fails to recognise the increasing use of internet shopping over the bricks and mortar experience. This is lamentable as the land allocated for retail could be put to much better use as residential.

72. I object to the inclusion of policy A58 – there is no justification for an increase in additional industrial floorspace at this location or indeed particularly as there are a number of vacant industrial sites at o Slyfield.

73. The AECOM work to support the ELNA is a poor piece of work riddled with unsupported assumptions.

74. I continue to object to the inclusion of the following policies: o A36-A41 inclusive in the Horsleys, A43 at Garlick’s Arch, A42 Clockbarn, and A58 There is no evidence that anyone has considered the cumulative impact of these developments together with the development at A35. The infrastructure proposed is totally inadequate and, as these stand at the borough boundary will have a huge impact on residents throughout the borough and further afield, particularly those who use the A3.

75. I object to the fact that there is no evidence that land owned by the council in the town centre is being used for residential development.

76. I object to the fact that the land required at Garlick’s Arch is said to be almost 29ha where only 13ha is required at 30dph.

77. Similarly, I object to the excess requirement for land at A53 where the normal plot ratio of 50% appears to have been ignored resulting in an excess use of green belt land of over 7.5ha.

78. I object to the housing number of 693/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.
79. I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.

80. The transport evidence provided shows an increase in congestion as a result of the planned developments. Insufficient modelling has been done to satisfy me that any of the strategic sites can move forward on this basis. The consequences are severe to residents of Guildford and those much further afield.

81. I object to the fact that there is no proposed location for a bus station in the town centre. This means it is impossible to model journey times from, for example A35 with any degree of reliability. Furthermore, the modelling capacity at SCC does not use “real world” situations for example the junctions do not allow for traffic stopped at red traffic lights and assume all time all direction running which is clearly a fallacy. This perhaps makes it easier to understand why the today’s congestion is so dire.

82. There is no evidence that noise and light pollution and the impact on both humans and wildlife has been adequately taken into account.

83. I object to the fact that policy S2 makes no distinction between previously developed land in the Green Belt. It is clear that the use of a site with no above ground building e.g. A35 has a far greater impact than the use of a site such as Send Prison.

84. I object to the fact that greenbelt sites are allocated to improve flexibility in the delivery of the plan. It is clear that the green belt should only be seen as a last resort, after all other opportunities have been fully explored.

85. I object to the use of a film on the GBC website promoting a biased view from those interviewed who would in the real world have been excluded due to conflicts of interest. This is unfortunately completed expected behaviour from a council that continues to promote opaque policy and one which has little respect from many residents.

86. I object to the fact that the prosed housing allocation at Slyfield of 1000 homes results in no increase in vehicles. This is a patently false assumption and leads me to question the soundness of the transport evidence base.

87. I object to the variation in the assessment of sites which is extremely inconsistent. In some cases, the TBHSPA appears to be a concern whereas in others it isn’t. The same applies to a number of elements including impact of conservations areas, SNCIs, views in and out etc.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. It is very worrying that the council does not appear to have either the resources or the intellect to get the basics right.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7795  
Respondent: 15673313 / Stephanie Wiera  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the
Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17251</th>
<th>Respondent: 15673313 / Stephanie Wiera</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4227</th>
<th>Respondent: 15674273 / Savills for Thames Water (Katherine Jones)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1285 of 2988
Specific Water Supply and Sewerage/Wastewater Infrastructure Comments:

Water treatment and wastewater/sewage treatment capacity maybe a constraint in some catchments within the Guildford Borough area. As the Local Plan is finalised we will be reviewing which of our treatment sites need upgrades to accommodate the growth and we are willing to have a meeting with the Council to discuss this.

The attached table provides Thames Water’s site specific comments from desktop assessments on water supply and sewerage/wastewater infrastructure in relation to the proposed housing sites, but more detailed modelling may be required to refine the requirements.

These sites have been assessed on an individual base with only limited opportunity to consider cumulative impacts. Therefore, the impact of multiple sites in the same area coming forward may have a greater impact. The scale, location and time to deliver any required network upgrades will be determined after receiving a clearer picture of the location, type and scale of development together with its phasing.

Where we have identified sites where drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development, in the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure required to support the development in line with the Core Strategy Policy IN2: Water Supply and Wastewater.

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and/or water pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7802  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A11

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
There is a history of some sewer flooding. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7803  
Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A12

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7804  
Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  
Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A13

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to
ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/7805  **Respondent:** 15674273 / Savills for Thames Water (Katherine Jones)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A14

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/7806  **Respondent:** 15674273 / Savills for Thames Water (Katherine Jones)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A15

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7807  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A16

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

There is a history of some sewer flooding. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7808  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A18
We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7809</th>
<th>Respondent: 15674273 / Savills for Thames Water (Katherine Jones)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A19</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>This site falls outside of Thames Water’s water supply boundary.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7810</th>
<th>Respondent: 15674273 / Savills for Thames Water (Katherine Jones)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7811  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A20

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site falls outside of Thames Water’s water supply boundary.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7812  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site falls outside of Thames Water’s water supply boundary.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
The proposed 140 dwellings and 60 bed care home exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Policy A24: Slyfield Area Regeneration Project, Guildford**

The SARP site includes Thames Water’s Guildford (Slyfield) Sewage Treatment Works (STW) site and the draft Local Plan proposes the relocation of the STW as part of the SARP.

To ensure sufficient wastewater treatment for the Guildford drainage area, and suitable drainage network provision for the SARP area, the development of the SARP will require the relocation of the Sewage Treatment Works.

This would be in the form of a new sewage treatment works and necessary supporting local drainage network infrastructure.

Thames Water is working with the Council regarding the redevelopment of the SARP site and the feasibility of relocating the STW to the land identified in the draft Local Plan.

Thames Water confirms its support in principle for the relocation of the STW. Detailed technical and feasibility assessments are being produced with the Council to support the next stages of design for the STW relocation.

**Omission Sites**

Thames Water consider that the following sites may become available and would be suitable for development:

1. **Land to the north of Ash Vale Sewage Treatment Works (STW) (approximately 3 hectares)**

   The land to the north of the main operational area of Ash Vale STW, as identified on the enclosed plan, is currently disused. The site is sustainably located next to main urban areas, a main road junction with bus services and the North Camp Rail Station.

   The site is well contained to the north by the Blackwater River, to the west by the railway line, to the east by housing and to the south by the main operational STW. There is existing residential development south of Meadow Close and along Stratford Road to the east.
The land is outside the Green Belt. Residential or employment development of the site could enable significant environmental improvements and part of the site to be opened up for public access along the river.

1. **Land at Netley Mill PS, West of Gomshall (approximately 5 hectares)**

Gomshall is an identified settlement in the Green Belt. The Thames Water land of which parts would be available for development adjoins the settlement to the west as identified on the enclosed plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7800  **Respondent:** 15674273 / Savills for Thames Water (Katherine Jones)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build.

The SARP site includes Thames Water’s Guildford (Slyfield) Sewage Treatment Works (STW) site.

The draft Local Plan proposes the relocation of the STW.

To ensure sufficient wastewater treatment for the Guildford drainage area, and suitable drainage network provision for the SARP area, the development will require the relocation of the Sewage Treatment Works and necessary supporting local drainage network infrastructure.

Thames Water is working with the Council regarding the redevelopment of the SARP site and the feasibility of relocating the STW to the land identified in the draft Local Plan.

Thames Water supports the principle of the relocation of the STW. Detailed technical and feasibility assessments are being produced with the Council to support the next stages of design for the STW relocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7813  **Respondent:** 15674273 / Savills for Thames Water (Katherine Jones)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 2000 dwellings and other development exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7814  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build.

We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater treatment capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and
the construction of a major treatment works extension or new treatment works could take up to ten years. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the infrastructure is in place ahead of occupation of the development. We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 1800 dwellings and other development exceed the capacity trigger levels for available network. The site would drain to Hockford STW which has a current Population Equivalent of 15,400. The scale of development proposed is significant for a STW of this size so a developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7815  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A27

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site falls outside of Thames Water’s water supply boundary.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

There is a history of some sewer flooding. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

An impact study would be required. There is history of hydraulic flooding and there are no surface water sewers shown in the vicinity of this proposed site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed development exceeds the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7818  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 116 dwellings exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7819  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater treatment capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the infrastructure is in place ahead of occupation of the development. We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

An impact study of the foul network has confirmed that there is not sufficient capacity to accept this development. An option has been included in the report.

Waste water treatment: We have concerns regarding sewage treatment capacity at Ripley STW to accept proposed flows from this development. Ripley STW has a current Population Equivalent of 15,400. It will be necessary for us to undertake upgrades to the works to enable the flows from the new development to be accepted. Programming of upgrades to the STW will be necessary and the developer shall notify Thames Water and the Planning Authority of phasing of development and any amendments thereof.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7820  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/7821  **Respondent:** 15674273 / Savills for Thames Water (Katherine Jones)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7822  **Respondent:** 15674273 / Savills for Thames Water (Katherine Jones)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed development exceeds the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPS16/7823  **Respondent:** 15674273 / Savills for Thames Water (Katherine Jones)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A39
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 135 dwellings exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7824  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to
under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 100 dwellings exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7825   Respondent: 15674273 / Savills for Thames Water (Katherine Jones)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

There is a history of some sewer flooding. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7826   Respondent: 15674273 / Savills for Thames Water (Katherine Jones)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

There are limited surface water sewers in the area so would need to understand the drainage strategy for this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 400 dwellings exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPS16/7830  | Respondent: | 15674273 / Savills for Thames Water (Katherine Jones) | Agent: |
|-------------|----------------|-------------|-----------------------------------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |
|             | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
|             | Answer (if comment is on questions 1-7 of the questionnaire): () |
|             | On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. |
|             | What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
|             | Attached documents: |

| Comment ID: | PSLPS16/7832  | Respondent: | 15674273 / Savills for Thames Water (Katherine Jones) | Agent: |
|-------------|----------------|-------------|-----------------------------------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A45 |
|             | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
|             | Answer (if comment is on questions 1-7 of the questionnaire): () |
|             | On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site. |
|             | What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
|             | Attached documents: |

| Comment ID: | PSLPS16/7833  | Respondent: | 15674273 / Savills for Thames Water (Katherine Jones) | Agent: |
|-------------|----------------|-------------|-----------------------------------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A46 |
We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater treatment capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the infrastructure is in place ahead of occupation of the development. We have significant concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is highly unlikely to be able to support the demand anticipated from this development. Significant drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver. The proposed 1,100 dwellings and other development exceed the capacity trigger levels for available network. The site would drain to Hockford STW which has a current Population Equivalent of 15,400. The scale of development proposed is significant for a STW of this size so a developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7834  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 125 dwellings exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We have concerns regarding Water Supply Services in relation to this site. Specifically, the water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing water infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity the Local Planning Authority should require the developer to provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

The proposed 200 dwellings and other development exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7837  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the water treatment infrastructure needs required to serve this development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: Water Treatment Works upgrades can take 18 months to 3 years to design and build.

We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. At the time planning permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development. It is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
The proposed 350 dwellings and other development exceed the capacity trigger levels for available network. Developer funded impact study required to understand implications of development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7838  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.

On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17256  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2 – Sustainable design, construction and energy

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water and the references to this in paragraphs 4.5.10 and 4.5.19, but consider that there should be clearer reference in Policy D2 itself.
Thames Water support the mains water consumption target of 110 litres per head per day as set out in the NPPG (Paragraph: 015 Reference ID: 56-015-20150327) and consider that this should be covered in Policy D2.

Thames Water have a water efficiency website:

http://www.thameswater.co.uk/save-water/3786.htm

Customers can discover how you can start saving water, help protect the environment, reduce your energy bill and even cut your water bill if you have a meter. You can calculate your water use, see how you compare against other Thames Water customers and the Government's target, and get lots of hints and tips on how to save water. Thames Water customers, can also order a range of free devices to help save water. The Policy/supporting text could make reference to this guidance.

However, managing demand alone will not be sufficient to meet increasing demand and Thames Water adopt the Government’s twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in the latest Thames Water Water Resource Management Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17255  Respondent: 15674273 / Savills for Thames Water (Katherine Jones)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1: Infrastructure and delivery

Thames Water support Policy I1 and supporting text in principle as it is largely in line with previous representations, but consider that minor changes would be helpful to provide clarity.

Thames Water support the Policy in principle as a key sustainability objective for the preparation of the new Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. The National Planning Policy Framework (NPPF) includes specific guidance on water and sewerage infrastructure. Paragraph 156 of the NPPF states: “Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver……the provision of infrastructure for water supply and wastewater....”

Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment…..take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”

The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that
“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water support the identification of water supply and waste water treatment infrastructure at paragraph 4.6.3, but given the importance of such infrastructure to sustainable development, it is considered that text along the following lines should be also included to support Policy I1: “The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and waste water treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing wastewater/sewerage infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.

The development or expansion of water supply or waste water treatment facilities will normally be supported, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”

Development Close to Thames Water Assets:

Where development is being proposed within 800m of a sewage/waste water treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.

Where development is being proposed within 15m of a pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a pumping station.

Where any such odour study in relation to development near a sewage treatment works or pumping station identifies there is an odour impact for proposed development and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.

Sustainable Drainage:

Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to:

- improve water quality
- provide opportunities for water efficiency
- provide enhanced landscape and visual features
With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Masterplan: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Potential Future Use

The eastern part of the BCN site is considered to have potential for both commercial and residential use. It is approximately 4 ha and on the basis of the surrounding area it is considered that up to 100 houses could be accommodated on the eastern part of the site which would equate to a density of approximately 25 dph which would be reasonable for this site given its surrounding context. This density enables a strong landscaped buffer to be created between the existing depot, the A3 and any residential development.

In addition to being suitable for commercial purposes due in part to the existing employment development on the site, we consider that the site is suitable for residential purposes as it lies directly adjacent to the existing residential dwellings of Clandon Road, which form part of the residential area of Burnt Common/Send Marsh. Residential development therefore would be a compatible use of this site. Residential development in this location would be contiguous with the existing residential dwellings of Burnt Common/Send Marsh in this area.

From a review of the GBCS both elements of the site fall within a parcel of land (B13-D), which as previously stated, has been identified as a PDA. Paragraph 1.37 of Volume I of the GBCS states that the land parcel in which the site falls within has the potential to accommodate appropriate development without compromising the purposes of the Green Belt in which it is located. It is noted to be an area that is surrounded by defensible boundaries and these include built physical features (roads) and significant tree screening.

The site, and indeed wider land parcel in which it is located is isolated from the wider green belt by the A3, the London Road and the Clandon Road which surround the site, making it an enclosed triangular parcel of land that is very much separated from the wider Green Belt. This helps to further ensure that development of the site (and wider land parcel) would not harm the character or appearance of the Green Belt in which it is located and would not set a precedent. This scenario is very similar to, and is supported by, the Burpham Court Farm development known as Weybrook (now a housing development with a large Sainsbury’s supermarket) which is also between the A3 and an A3 slip road in a triangular shape.

The Council accepted the above and proceeded to allocate the site in the Draft Local Plan for commercial and residential development. The subsequent change was very late in the day.

The tree belts surrounding the site serve an important function when considering the visual impact of the site as well as reinforcing the sites’ isolation from the open Green Belt. Tree belts follow London Road (including within the central
reservation) and Clandon Road to the north and east, there is also significant tree cover following the A3 to the south and hedgerows near the commercial area to the east of PDA. This ensures that the site is well screened and as such views of any development would be extremely limited. Additional landscaping will be incorporated into the proposed development to ensure that any perceived areas of weakness in the existing landscaping can strengthened, particularly along its eastern boundary with the existing depot.

The GBCS also notes that the site is relatively unconstrained in environmental capacity terms and as being in an area of existing development. In addition, that assessment was based on a larger site, including more open land to the north of the old A3 London Road. Therefore, the BCN part of the site is even better in itself than the overall site assessed in landscape terms.

This further supports the Council’s own previous conclusions that that development of the identified land parcel (and therefore the site) will not harm the purposes of the Green Belt and is the best site to allocate in this locality.

In terms of impact on existing residential amenity, the site is located at a sufficient distance from surrounding residential dwellings so as not to have an adverse impact on outlook or privacy. Furthermore, the site is well screened by existing mature tree boundaries and this will be enhanced as part of the proposed development. The site is also situated at a slightly lower level from the surrounding area which ensures that any development on the site will not appear overbearing.

As previously stated a landscaped tree buffer will be created between the existing depot and any new residential dwellings to ensure that future residential amenity is protected.

The only residential property which has a direct view towards the site is a single first floor window in Thatched Cottage, which is to the north east of the site. However, due to the extensive tree cover that surrounds the site views from this window are limited, and additional landscaping can be incorporated into any development proposal to ensure that any views are not sufficiently detrimental and built form can be located at an appropriate distance from this boundary to prevent issues of overlooking/ loss of privacy etc.

As previously stated, access can be provided directly from the London Road. It serves the adjacent depot and auction centre and the residential dwellings on Woodhill/ Vicarage Lane. The south-west bound carriageway of the road is wide enough to accommodate two lanes of traffic and the southern side of the road is currently hatched and could be easily modified to safely accommodate the new access. As such it would be possible to provide two lane traffic if required, although this is unlikely as a part of a residential scheme. In terms of traffic generation, there would be an increase, however the direct accessibility onto London Road is a benefit in this regard. Given London Road is a main road (formerly the A3), and experiences relatively low traffic movements, there is capacity to accommodate a moderate residential and commercial development. Furthermore, it provides direct and efficient access to the A3, A247 and the wider highway network.

Finally, the site is not within an area that is subject to flooding.

 Deliverability
In terms of deliverability the site at BCN recommended for progression to the Submission Local Plan, excluding the Ewbanks site, is in single ownership, is available and deliverable with 1-5 years (subject to securing planning permission). It can satisfactorily accommodate the 7000 square metres of employment space and 100 homes. The Newship Groups sister company has significant experience of developing residential estates, ensuring comfort in that respect. The Newship Group has a track record of developing industrial and warehousing development, with sufficient funds, providing further certainty of delivery (this cannot be said of the Garlicks Arch site).

Further comment on the Garlick’s Arch site
The Garlick’s Arch site would provide 400 dwellings, a quantity of employment floorspace (in Use Classes B1c, B2, B8) and a new northbound onslip to the A3 trunk road from Clandon Road (A247) and a new southbound offslip from the A3 trunk road to Clandon Road.

That part of the Garlick’s Arch site on the northern side of the A3 is approx. 31.7ha. This compares with the size of the existing settlement of Burnt Common/ Send Marsh, which occupies approx. 70ha. The Garlick’s Arch site would therefore result in approximately a 50% increase in the size of the village. Given the settlement is described as a rural village, this is an unjustifiable increase in the size of the settlement.
This is the wrong place for employment space. It would be unrelated to any other conventional employment space and result in employment space spread across Burntcommon rather than concentrated in a more logical and appropriate location.

The Local Plan also includes a proposal for the provision of new slip roads onto the A3 to/from Clandon Road. These are considered necessary highway improvements for one or more of the following:

1. The proposed development;
2. To facilitate other development allocated in the emerging Plan;
3. To facilitate other development envisaged in the emerging Plan.

All new development is required to propose highway measures necessary to make that development acceptable in planning terms, so if the new slip roads onto the A3 are required to make the proposed development at Garlick’s Arch acceptable in planning terms that would not comprise very special circumstances.

A similar conclusion is drawn for point 2 above i.e. to facilitate other development allocated in the emerging Plan. It is the case that new residential development allocated at the Gosden Hill site benefits from access to and from the A3 in all directions as follows:

1. Off slip from A3 southbound at Burpham and then access via New Inn Lane;
2. On-slip onto the A3 northbound via Clay Lane;
3. Off slip from A3 northbound at Burnt Common, A247 through West Clandon; A25 west and then to the Gosden Hill site via Park Lane and Merrow Lane;
4. On-slip onto the A3 southbound at Burnt Common (via the above in reverse).

Thus, there is no demonstration of very special circumstances to facilitate other development allocated in the emerging Plan.

WYG notes that other development envisaged in the Plan includes a long term aim of placing the A3, as it passes through Guildford, in a tunnel. The tunnel would potentially commence in the vicinity of the junction of the A3 with Woking Road and follow a south-westerly alignment, emerging at ground level south of Farnham Road. Whilst this is very high level and the feasibility of the tunnel has yet to be proven, it would offer a number of benefits to the town, not least of which would be the re-routing of through traffic away from a busy stretch of road that is likely to become more heavily used as a result of planned new development. The provision of a tunnel also offers the opportunity to connect the two parts of the town and carry out environmental enhancements.

Unfortunately, some vehicles are precluded from travelling through tunnels and measures would need to be provided to enable such vehicles to leave the A3 before entering the tunnel. South of Guildford, a new junction would be required in any case (to enable vehicles to continue travelling south along the A3 or west along the A31). This would not impact upon Burnt Common. At the northern end of the tunnel, a new junction would not need to be provided however, as the existing junction with Woking Road provides a southbound off-slip and northbound on-slip, in addition to the London Road/A3100/Clay Lane existing slip roads.

As a result, it is the case that a new southbound off-slip and northbound on-slip are not required at Burnt Common to facilitate the tunnel under the A3.

As a result, the proposed allocation at Garlick’s Arch does not offer any very special circumstances that warrant a development of the size indicated in the emerging Plan. The allocations for both the slip roads and the Garlicks Arch site should therefore be removed from the Local Plan.

Should new slip roads onto the A3 to/from Clandon Road be required by Highways England, these could in any case be provided without developing the Garlick’s Arch site. The land could be safeguarded pending a review of the Plan, which would in any case be required once Highways England determine whether the A3 at Guildford is to be widened or placed into a tunnel. This is the appropriate approach to take and recognised on page 9 of the Transport Strategy for the Borough:
‘Our proposed draft Local Plan will ensure that development at the Gosden Hill Farm site will safeguard the ability to create an all-movements A3 junction to the east of Guildford, until such time as Highways England determine whether or not this is required for their A3 Guildford scheme.’

Thus, there is no requirement in highway and transport terms to allocate the Garlick’s Arch site at this time.

Furthermore, development of the GA site would result in a significant adverse impact on the Green Belt due to the topography and open character of the site, which rises to the south and west, from a low point at the north-eastern end. There are clear and expansive views into and over the site from a range of locations around the site. As a result of its topography and the views into and across the site it has a significant beneficial impact on the openness of the Green Belt. The site contributes to the purpose and function of the Green Belt.

As a result, development on the site would significantly reduce openness, harming a key purpose and function of the Green Belt.

One of the reasons for removing the Burnt Common site in favour of the GA site, as referred to earlier in this letter, was to afford greater separation between Send Marsh/ Burnt Common and the proposed site allocation at Gosden Hill Farm. This is erroneous and an illogical conclusion for the following reasons:

- The Burnt Common Nurseries site is already partly developed;
- The Burnt Common Nurseries site is well contained and enclosed from views from the A3;
- The Burnt Common Nurseries site is smaller than the Garlick’s Arch site and contains features that are not characteristic of the rural landscape;
- The Garlick’s Arch site in comparison contains features that are characteristic of the rural landscape and is in agricultural use;
- There is a change in levels;
- A large part of the Garlick’s Arch boundary is un-vegetated which offers an open and unrestricted view into the site, particularly from the south-east;
- The lack of boundary vegetation at the Garlick’s Arch site allows visibility into the site on a scale not possible at Burnt Common Nurseries.

Thus, the development of the Garlick’s Arch site would have a greater adverse impact on the Green Belt and lead to a reduction in the separation between Send Marsh/ Burnt Common and the proposed site allocation at Gosden Hill Farm to a greater degree and extent than if the Burnt Common Nurseries site is developed as proposed.

Furthermore, the Ewbank’s auctions westernmost triangle of land could be excluded from the allocation; with a suitably landscaped boundary between the allocated site and the Ewbank’s auctions site, there would be a consequent increase in separation between Send Marsh/ Burnt Common and the proposed site allocation at Gosden Hill Farm.

The Garlick’s Arch site is too large for the size, character and function of the settlement; it is not required to enable an improved junction onto and from the A3 north of Guildford and there are significant Green Belt and landscape constraints indicating the site should not be developed.

This compares with the Burnt Common site, which is enclosed and development on the site would not result in a loss of openness or impact on the purpose and function of the Green Belt.

The Garlick’s Arch site contains areas of ancient woodland that could be fragmented by development of the site.

This compares with the Burnt Common site, which does not contain environmental designations; the ancient woodland adjacent to the BCN site would be retained and linked to the wider area through strengthened tree belts. Development of the Burnt Common site would be at a low density, allowing space for existing flora and fauna and enhance biodiversity through the provision of a range of habitats in close proximity, including trees, hedgerows, open grassland, a pond and areas of undisturbed ground. Finally, this would all be provided within an enclosed setting that would not result in light pollution or a significant increase in artificial light; thus respecting the environment for the future.

The proposed residential development of the Burnt Common Nurseries site potentially includes children’s play facilities, a village green and space around the dwellings. The commercial development is separated from the residential dwellings by...
the existing warehouse, which is well enclosed and screened by existing vegetation. This will be supplemented to
strengthen wildlife links to and from the ancient woodland and residential development would not be located unacceptably
close to existing noise generating sources.

Finally, the provision of a range of residential and commercial development that is proportionate and commensurate with
the size, character and function of Burnt Common/ Send Marsh, benefits the local area without having a serious adverse
impact on local services and facilities. It is clear therefore that a development of this type contributes to the three main aims
of sustainable development – social, economic and environmental.

Conclusion
It is considered that given the subject sites’ location, its sustainability credentials, housing need in the Borough and the
assessments of the GBCS it represents a prime opportunity for residential and commercial development that it has been
demonstrated is proportionate and commensurate with the size, character and function of the existing settlement.

It is considered that up to 100 dwellings could be achieved on the eastern portion of the site, which would represent a
suitably low density of development. This in turn enables the site to retain an open and spacious character, and retention
and sympathetic enhancement to the existing ancient woodland through strengthening the tree belts around the site to
provide wildlife corridors to adjacent areas.

It is considered that the Council should re-allocate the Burnt Common Nurseries site in the emerging Local Plan for the
following summary reasons:

• The site is in a sustainable location – BCN site placed first whilst GA site last in GB&CS 2014;
• The Council considers that the village can accommodate future development, commensurate to its size, character
  and function. The proposed allocation at BCN is commensurate to the size, character and function of
  Burntcommon and Sendmarsh;
• There is a real need for housing in Guildford. Currently the Council do not have a 5 year supply of housing and
  have no reasonable prospect of achieving this for some years through existing allocations. Therefore, in
  accordance with the NPPF the Council should consider favourably proposals for housing where the principles of
  sustainable development can be achieved. This is particularly the case where sites are identified as being
deliverable and capable of providing a high proportion of affordable dwellings;
• There is a real need for commercial development on this site in the form of B1(c), B2 and B8 uses as
  acknowledged by the Council and supported by Lambert Smith Hampton;
• The BCN site is an existing partly previously developed commercial employment site. It makes much more sense
  to consolidate employment at Burnt Common in one location, rather than spread it over two.
• The Council twice previously identified and allocated the site for future housing and employment development in
  the emerging Plan, demonstrating its acceptable credentials;
• Residential use of the site would be compatible with adjacent land uses and form a natural extension of and be
  contiguous with the residential environment of Burnt Common/ Send Marsh, which is listed in the settlement
  hierarchy as a large village;
• Commercial development would be most logical on this site due to the existing employment development on the
  site and Newship Group experience;
• The site has defensible boundaries which will ensure that its development will not harm the purposes or
  openness of the wider Green Belt;
• Separation to Gosden Hill Farm can be achieved by removal of the Ewbanks auction part of the previous
  allocation;
• The site is similar to the previously developed site Weybrook in Burpham (now a housing development with a
  Sainsbury’s supermarket) which also lies between the A3 and a slip road.
• The site is isolated from the wider Green Belt, being a very enclosed site in functional, landscape and visual
  terms;
• The site is not constrained by any other sensitive planning designations;
• There were relatively few objections to the previous allocation of the BCN site in the 2014 Plan. This position
  has been supported in our recent discussions with both Send Parish Council and those residents involved in Save
  Ripley, both of whom, as we understand it, support our site as opposed to the Garlicks Arch site. The relative
  weight of public opinion should be strongly taken into account when concluding on the best site in this area;
• The BCN site is deliverable within 1 – 5 years, demonstrated also by the existing single owners experience and their employment development credentials;
• The BCN site would not impact materially on any existing residential properties;
• The BCN site is well screened already by mature tree planting;
• The BCN site is located around and between existing development – residential to the east and commercial to the west;
• Allocation of the Garlick’s Arch site would potentially result in much of the local road network in Send/ Ripley exceeding its theoretical operational capacity should highway improvements not be provided;
• The inclusion of the proposed new slip roads at Garlick’s Arch would result in significant levels of traffic re-routing locally (i.e. along the A247) and would therefore still not materially improve the local highway network overall;
• The inclusion of the slip roads at Garlick’s Arch would not have a material direct benefit to the local or strategic highway network and would simply result in the rerouting of traffic elsewhere (i.e. the A247 Clandon Road) to the detriment of other parts of the local highway network;
• There is no need for the Garlick’s Arch site to be allocated in the emerging Plan at this time and if necessary, the site/appropriate land could be safeguarded for highway improvements to the A3 as part of a review of the Plan once Highways England determine the optimum solution for the A3 through Guildford;
• The Garlick’s Arch site is too large for the size, character and function of the settlement; it is not required to enable an improved junction onto and from the A3 north of Guildford and there are significant Green Belt and landscape constraints indicating the site should not be developed; and
• If other strategic sites in the Green Belt (such as Wisley) not be allocated for development, the Burnt Common Nurseries site becomes all the more relevant and necessary to enable the Council to achieve its objectives.

With all of the above in mind we strongly assert that the most logical, reliable, commensurate and credible allocation for employment space, with the least constraints, is the land around the existing Burnt Common Warehouse.

It is suitable, developable and deliverable for both commercial and residential development. As such the site should be included in the Council’s Submission Local Plan and excluded from the Green Belt in any Green Belt review.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7846</th>
<th>Respondent: 15674561 / Andy Stallan (WYG)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Allocation of Sites - Burnt Common Nurseries site should be allocated in the Submission Plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Please refer to the accompanying seperate representation submission letter dated 15th July 2016 for details</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents: [160718 LVA Report Appendices for Burnt Common Nurseries.pdf](5.1 MB)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>[160718 Highway Appraisal 3206 TN01 B.pdf](619 KB)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Comment ID: PSLPP16/17653  Respondent: 15674561 / Andy Stallan (WYG)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Section 4.4: Economy Policies: Policy E5

The NRA endorse the inclusion within the first bullet point of Policy E5 the clear statement that to promote a strong rural economy the sustainable growth and expansion of all types of business and enterprise in rural areas will be supported through conversion of existing buildings and provision of well-designed new buildings of appropriate scale, provided they are in accordance with green belt policies and other policies in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17654  Respondent: 15674561 / Andy Stallan (WYG)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Section 4.4: Economy Policies: Policy E6: The leisure and visitor experience

The NRA are pleased to see paragraphs 4.4.53 – 4.4.56 provide a summary of the role and contribution that the leisure and visitor experience provides to the quality of life, social and cultural wellbeing of the Borough. The sectors contribution and value to the Borough’s economy is also rightly noted within the text.

The NRA would be pleased if within paragraph 4.4.55 the Council wished to refer to the Bisley Camp and the NRA as another of the Borough’s named recreational and tourism attractions and leisure opportunity.
The NRA consider the wording of Policy E6 is correctly supportive for the Borough’s future leisure and visitor experience and is pleased to see the provision of new and enhanced leisure and visitor attractions and the provision of new and improved accommodation and conference facilities for tourist and business visitors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17652  Respondent: 15674561 / Andy Stallan (WYG)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Section 4.3: Protecting Policies; Policy P2: Green Belt

The NRA note paragraph 4.3.11 reflects the NPPF in stating that the main aim of Green Belt is to prevent urban sprawl by keeping land permanently open.

Paragraph 4.3.12 states that historically all the villages in the Borough, except Ash Green, and major previously developed sites have been washed over by the Green Belt designation. The text then correctly confirms that the NPPF states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included within it. Those that do not should be inset, or removed, from it and other development management policies used to restrict any inappropriate development.

Paragraph 4.3.13 provides a list of villages which under LP1 will now be inset from the Green Belt.

Paragraph 4.3.14 follows and clearly states that although not villages, a similar approach is to be applied to major previously developed sites in relation to whether they should remain washed over or be inset from the Green Belt. Again the paragraph correctly reiterates that the NPPF requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt. If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.

Paragraph 4.3.15 goes on to list the major previously developed sites (MPDS) which will become inset from the Green Belt under LP1. These are: Henley Business Park, HM Prison Send, Keogh Barracks, Mount Browne, Pirbright Barracks, Pirbright Institute and the University of Law Guildford.

The NRA do not object to the insetting of any of these MPDS from the Green Belt. However, the NRA are entirely concerned, and disappointed, by: 1) the omission of Bisley Camp from the list of major previously developed sites within the Borough set out by paragraph 4.3.15; and 2) the according omission of Bisley Camps developed land area as being inset from the Green Belt and shown to be so on the proposals maps of LP1.

As the Council will recall, in response to the consultation on the DLP in late 2014 the NRA submitted representations on the findings of the Council’s Green Belt and Countryside Study (GBCS) which comprised, and still does, part of the evidence base upon which the new local plan and its policies are being developed. It is not our intention to fully reiterate the content of the representations made in response to the DLP in response to LP1. A copy of the complete submission is however included at Appendix 1 of this submission for ease of reference and we invite the Council to review it again as a comprehensive element of the NRA’s submission to LP1, specifically in regard to the content under the section heading ‘Assessment of the Evidence Base’.
As currently written, whether by intention or otherwise, the NRA are concerned that between the consultation on the DLP the potential, and correct, status of the developed area of Bisley Camp as a MPDS has now been withdrawn by LP1. This is sincerely disappointing given the comparable similarities identified for the Council within the NRA’s representations made in response to the DLP, specifically regarding the developed area of Bisley Camp and Henley Business Park and The University of Law. The NRA consider that the status of these sites as MPDS support the basis for recognising and establishing Bisley Camp as a MPDS within LP1; and equally for Bisley Camp to be removed from the Green Belt also.

Accordingly, the NRA would like to see paragraph 4.3.15 amended to include Bisley Camp as a specified major previously developed site. The NRA also consider that the boundary of Bisley Camp’s MPDS should be drawn on the LP1 proposal maps to the extent shown on the drawing attached as Appendix 2 of this letter.

The NRA also note that beyond the reference to MPDS within paragraph 4.3.15 LP1 does not contain any other policy concerning MPDS. Having spoken with members of the Council’s Policy Team we have been advised that, at this time, it is the intention that a specific policy or set of policies relating to MPDS’s will be brought forward as part of the future Local Plan 2: Development Management Policies (LP2). It is considered this approach is less than ideal for the NRA and Bisley Camp. Firstly, although a MPDS policy could conceivably be delivered via the LP2 given the purpose and intent of MPDS status and its implications it is considered that this matter should be addressed as part of the LP1. MPDS are strategic policy designations and their designation and policy context should be developed and assessed accordingly.

Indeed, as currently written in LP1 it would appear that this is what the consequence of paragraph 4.3.15 and the proposals maps are already establishing. The omission of Bisley Camp as an inset MPDS within LP1 is therefore failing to support the future regeneration and potential sustainable growth of the camp as a significant contributor to the leisure and tourism industry within the Borough. This would be contrary to paragraph 28 of the NPPF and likewise to the Council’s own stated spatial vision.

In summary conclusion, the NRA consider Bisley Camp should be allocated as an inset major previously developed site. Insetting the site would not conflict with the purposes of including land within the Green Belt (as defined by Paragraph 80 of the NPPF) and, on balance, there is no reason why sufficient defensible boundaries (in compliance with Paragraph 85 of the NPPF) should not be identified. In this regard the NRA would welcome further dialogue with Officers of the Policy Team to discuss and provide additional boundary information. Furthermore, as identified in paragraph 20.8 of the GBCS, if major previously developed sites are not considered appropriate for insetting and are to remain washed over within the Green Belt this implies the open character of the site makes an important contribution to openness. This in turn implies there is limited opportunity to redevelop, or expand the site, without detracting from the openness of the Green Belt. It is evident from an objective assessment of the major developed area at Bisley Camp that the land does not make such an important contribution to the openness of the Green Belt nor does it in landscape character terms as identified in the Council’s own Landscape Character Appraisals. It is also evident that Bisley Camp exhibits comparable features with other major previously developed sites in the Borough that are proposed to be inset from the Green Belt and are stated as such within paragraph 4.3.15 of LP1.

The NRA generally support the wording of Policy P2.

However, the 4th bullet point of paragraph 89 of the NPPF clearly states the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces is one of the stated exceptions whereby the construction of a new building need not be considered inappropriate. Nowhere within the NPPF is it stated or implied that new buildings must also be sited on or close to the position of the existing building.

The inclusion of this requirement within Policy P2 is therefore entirely unnecessary, unduly restrictive and fails to accord with the corresponding Green Belt policies of the NPPF. The inclusion of this requirement within Policy P2 is also unqualified within the supporting text to justify why such a specific additional policy requirement should be included within the Borough’s development plan.
The NRA would therefore support an amendment to Policy P2 so that it reads:

‘…Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:…

Replacement buildings
The replacement of a building, provided the new building:

• Would be in the same use, and
• Is not materially larger than the one it replaces, and
• Is sited on or close to the position of the existing building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy S1: Presumption in Favour of Sustainable Development
The NRA support the presumption in favour of sustainable development and the commitment to work proactively with applicants to jointly find solutions that mean that proposals can be approved wherever possible; and to secure development that improves the economic, social and environmental conditions in the area. This approach being compliant with the National Planning Policy Framework (NPPF).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy S2: Presumption in Favour of Sustainable Development
The NRA support the presumption in favour of sustainable development and the commitment to work proactively with applicants to jointly find solutions that mean that proposals can be approved wherever possible; and to secure development that improves the economic, social and environmental conditions in the area. This approach being compliant with the National Planning Policy Framework (NPPF).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
RE: WRITTEN REPRESENTATIONS IN RESPONSE TO THE COUNCIL’S PROPOSED SUBMISSION LOCAL PLAN (REGULATION 19) CONSULTATION ON BEHALF OF BURNT COMMON NURSERIES LTD

LAND AT BURNT COMMON NURSERIES, SEND, GUILDFORD

Introduction and Summary case
We are writing on behalf of our clients, Burnt Common Nurseries Ltd, part of Newship Group, to request that the land known as Burnt Common Nurseries, London Road, Send, be re-allocated in the emerging Guildford Local Plan for a mix of employment and housing development.

Please take full account of these representations together with previous representations contained in a statement dated September 2014 from ourselves (then Alliance Planning) when reaching a view on the Submission Local Plan.

Our proposal is that a smaller allocation could and should be re-instated in the Plan by removing at least the narrowest part, if not all of the Ewbanks auctioneers area of the previous allocation. This is recommended for three main reasons.

Firstly, the Burnt Common Nurseries site (BCN) can satisfactorily accommodate the previously agreed quantum of development – 7,000 square metres of employment floorspace and up to 100 homes on the site, without incursion onto or requiring any part of the Ewbanks auctioneers site.

Secondly, removing at least part, if not all, of the Ewbanks element from the previous allocation would increase the separation gap in Green Belt terms from the proposed Gosden Hill allocation; addressing the second bullet point referred to on the late correction update sheet to the 11th May Executive Committee justifying the allocation of Garlick’s Arch (GA) in place of the BCN site.

Thirdly, the Ewbanks area of the site is more constrained for development due to its more open and narrowing nature towards the junction of the A3 and the slip road off the A3.

This representation sets out why the BCN site should be re-allocated, including in part due to its benefits as compared to the GA site (see evidence later in this representation). Clearly, the Council needs to allocate sufficient land to meet its up-to-date objectively assessed need for housing and employment requirement. There are very strong reasons for the BCN site to be re-allocated, which are discussed below.

The Newship Group has built, let and managed a number of industrial estates over the last 38 years. This site has been owned by the Newship Group since the 1980’s, originally when it was run as commercial nursery, with vast commercial greenhouse buildings spread across the site, together with the warehouse buildings. The commercial nursery use failed due to foreign competition and losing its main customer. The site has not, therefore, been held speculatively and not been sold on to a developer, which could well have happened if it were not for the responsible ownership of the Newship Group. The intention is to progressively develop the site for much need local employment premises, for which there have been a number of expressions of interest from companies unable to identify suitable commercial space, together with much needed housing as a sustainable mixed use development.

Over the last three years, the Newship Group has worked closely and positively with the Council to bring forward the undeveloped part of the site for business use and potentially 100 homes.

It was therefore a surprise and disappointment when, due to the quick change of direction part way through the Committee process, the allocation of the site was removed from the emerging Plan. The Group remains keen to work closely with the Council on delivering this site, which is acknowledged to be appropriate for development, particularly for employment use, but also for a proportionate amount of housing.

It is important to note, when assessing the relative merits of sites, that there were relatively few objections to the previous allocation of the site in the 2014 Plan. This position has been supported in our recent discussions with both Send Parish Council and those residents involved in Save Ripley, both of whom, as we understand it, support our site as opposed to the Garlicks Arch site. The relative weight of public opinion should be strongly taken into account when concluding on the best site in this area.
The Newship Group is primarily interested in delivering employment and has been working towards achieving this objective in collaboration with the Council for a number of years. There are four main reasons why the Burnt Common Nurseries site is considered a much more certain and credible location to deliver the employment space needed.

Firstly, it is an existing employment site. It makes much more sense to consolidate employment at Burnt Common in one location, rather than spread it over two. It is also a more efficient use of land and would result in an external economy of scale, due to its location adjacent to similar enterprises. This would not be the case at Garlick’s Arch, where there is a car repair/garage only (planning permission for residential applied for).

Secondly, it offers the opportunity to deliver early expansion. Unlike Garlick’s Arch, the site is not dependent on new access roads, nor do electricity pylons run across the site. It is not in a restrictive flood zone. There are also extensive areas of ancient woodland that require careful consideration as part of any scheme on the Garlick’s Arch site. Given the lack of such constraints Burnt Common Nurseries Ltd are in a position to submit planning applications and begin on-site straight away. That is important, because deliverability will be a key issue when assessing the soundness of the emerging Plan at the Local Plan examination.

Thirdly, the Burnt Common Nurseries site is an acceptable site that does not compromise the purposes of the Green Belt. Although both sites are in the Green Belt, only the BCN site has a significant proportion of previously-developed land. There are also 24,000 square metres of land surrounding the existing warehouses so 7,000 square metres of employment space could easily be absorbed without having an adverse impact on openness or the five purposes of the Green Belt. This is why the Council previously proposed to allocate it.

Fourthly, the site is sustainable, with good vehicular access that minimises the impact on the local highway network and local residents. The site is close enough to Send Marsh to provide shorter and more convenient journeys to work and promote rural sustainability, but is also sufficiently removed from the main residential areas and sufficiently screened by mature trees to minimise impact on residential amenity. The existing highway network facilitates convenient access to and from the A3 without needing to travel through the existing village.

In summary, the most logical, reliable and credible allocation for employment space, with the least constraints, is the Land around the existing Burnt Common Warehouse. The Newship Group is committed to providing this, and its track-record offers peace of mind that it would be delivered early and to a high standard. To demonstrate this, a proposed site plan dated September 2014 (prepared by Edgington Spink Hyne Architects) is enclosed with this representation. This shows the first phase of commercial development on the site, which would be replicated (handed) immediately to the west to provide the total commercial floorspace envisaged, in an attractive and well landscaped setting.

In overall terms the proposal to locate further employment space alongside an existing commercial employment estate (and a former commercial nursery) is the most logical and appropriate solution for the Burntcommon and Sendmarsh area. The Newship Group, operators of BCN Ltd, have significant experience of developing such employment sites. The housing is not Newship’s prime area of concern, but an allocation for approximately 100 homes in this location, between existing commercial buildings and housing along the A247, is the most commensurate, proportionate and logical place to accommodate such a development in Burntcommon and Sendmarsh. The lack of constraints and single ownership ensure that early delivery could take place.

Relevant background, history and assessment
The Draft Local Plan explains that Send is one of only two villages in the Borough where affordable housing in perpetuity as a rural exception cannot be provided. Thus, a previously developed site that provides affordable housing in Send would contribute significantly to local need in a manner compliant with national and local planning policy. This is clearly a very significant material consideration when determining potential sites to allocate for future development.

Policy 9 of the Draft Local Plan (2014) explains that development should help support the present and future economic, environmental and social sustainability of the rural settlements, commensurate to their size, character and function. The Policy continues, explaining that ‘... all development should be appropriate in scale and design, having regard to each settlement’s identity, countryside setting and local character and distinctiveness.’ This is particularly relevant for the Council to take into account when considering the scale of allocation appropriate for Burntcommon and Sendmarsh. The proposed allocation at BCN is commensurate to the size, character and function of Burntcommon and Sendmarsh.
In relation to the Green Belt, Draft Local Plan Policy 10 is clearly relevant. This Policy explains that the Green Belt will be protected against inappropriate development in accordance with national planning policy to maintain its openness and open character.

The site is currently located within the Green Belt. The Green Belt and Countryside Study (GBCS), which forms part of the evidence base to the emerging Local Plan included the site as B13-D (critically with additional wider areas of land steering the assessment to be scored two against green belt purposes when in fact the BCN land itself would result in a preferential score). Following review of the GBCS, it was identified as a Potential Development Area (PDA) due to its sustainability credentials, accessibility and defensible boundaries.

The site was also identified in the Strategy and Sites Issues and Options Paper as having good potential for industrial (Use Class B2) and/ or warehouse (Use Class B8) uses (see Information Sheet 59 in Appendix D of the Issues and Options Paper 2013).

The site was subsequently positively allocated in the Draft Local Plan (2014), for up to 7000 square metres of light industrial (B1c), general industrial (B2) and/or storage and distribution (B8) employment buildings and approximately 100 homes (C3). Land to the east of the existing warehouses was considered appropriate for new homes, at least 40% of which would be affordable. Land to the rear and the west of the existing employment buildings would be appropriate for employment expansion.

The site was included in the Land Availability Assessment (LAA) dated February 2016 as Site Reference 152 and the conclusions of this document are pertinent and relevant to constraint and delivery considerations. It is accepted that the site is in Flood Zone 1, at low risk of flooding, and that residential and commercial development would not adversely affect flood risk elsewhere. Drainage infrastructure would be required. It is accepted that development here would be acceptable on the local highway network.

The report concludes that 'Provision of new homes and commercial development here would help towards meeting the housing and employment need in the Local Plan and contribute towards achieving sustainable, inclusive and mixed communities.’ It is accepted that ‘There is a realistic prospect that development will be delivered within the first five years of the Local Plan….The site is most suited for mixed residential and commercial development, to provide new homes and jobs to help meet the identified need.’

Approximately 20,000 representations were made to GBC on the 2014 Draft Local Plan. Limited adverse comments were received to the BCN site. Having considered those comments, GBC again proposed the allocation for BCN in the 2016 Proposed Submission Local Plan as Policy A43. This was considered at the Borough, Economy and Infrastructure Executive Advisory Board Committee on 13 April. The site at BCN was agreed by this Committee without comment.

The site was again included in the proposed Submission Plan to the Executive Committee by Officers, but in a late update sheet, officers recommended that the BCN site be replaced by the GA site. The Executive Committee agreed this change with very little supporting argument or information; the late update sheet comprising a single side of A4 text, putting forward 4 reasons for the change.

Our assessment of reasons put forward to the Executive Committee recommending the change from BCN to GA:

Provision of land for slip-roads
The slip-roads are identified as a long term aspiration; they have not been fully assessed or even their need agreed by Highways England. We understand that the land ownership required to provide them is not all in the control of the GA owners. The funding has not been specifically quantified or agreed. Slip-roads will result in significantly more traffic on local roads in the Burntcommon and Sendmarsh area (Guildford will be aware of Woking’s proposals for a significant allocation of land at Mayford for approx. 600 homes in their emerging Plan. The traffic from that development and south Woking would be encouraged to utilise the A247 through Sendmarsh to access the A3, particularly if the junction was upgraded to provide a northbound access onto the A3). If slip-roads are pursued, they could be secured via other means i.e. being reserved pending Highways England conclusions or via CPO. Therefore, the provision of land to potentially provide slip-roads should not obscure and/ or outweigh serious questions over the appropriateness of the GA allocation in terms of Green Belt constraints and in terms of delivery and early delivery in particular. The GA site must still be considered on its
own merits as to whether it complies with planning policies in the round, in comparison to other local sites and is a
commensurate, proportionate and appropriate allocation in relation to Burntcommon and Sendmarsh.

Greater separation from Gosden Hill Farm proposed allocation
If the proposed allocation for BCN is reduced in size to remove either the whole or significant part of Ewbank auctions site,
as suggested earlier in this representation, the distance from the newly expanded Gosden Hill Farm site to the newly
proposed BCN site will be increased. In any case, the existence of a) the A3, b) significant mature woodland screening and
c) a significant change in levels, between the two sites is a significant and sufficient defensible barrier both in functional
green belt gap and visual amenity terms between the two sites to enable both the Gosden Hill Farm and the BCN site to be
allocated.

Provision of employment floorspace
The proposed employment allocation in the 2014 Local Plan and original 2016 versions both had a commercial
development allocation of up to 7,000 square metres on the BCN site. This figure was then transferred directly to the GA
site. This does not strike us as being a reason to support the GA site. The employment allocation is clearly far more
appropriate adjacent to an existing employment area in Burntcommon and Sendmarsh that is more appropriately located in
relation to the main part of Burntcommon and Sendmarsh, comprising a more enclosed and contained site that is less
harmful to the character of the landscape and visual amenity) for such a use (please see the enclosed Landscape and Visual
Appraisal (LVA) for reference). There is also the clear option, if the GA site is to be kept in the Plan, notwithstanding early
delivery and constraint concerns, to potentially split the allocation between solely residential on the GA site, of whatever
scale, and employment, with or without residential, also on the BCN site. Clearly our strong view is that both employment
and residential can satisfactorily be accommodated at BCN early in the plan period due to the lack of constraints and single
ownership.

Additional capacity for early delivery of more residential development
WYG take the view that this also is an erroneous reason. For the above reasons, early delivery at GA is unlikely to be
possible due to the number of constraints applying to that site and the lack of single ownership, as we understand the
position. Although the site could accommodate more development than BCN, whether it can be realistically delivered at an
early stage in the Plan period is in doubt until and if proved otherwise. Early delivery at BCN is in our view far more likely
to materialise due to the lack of constraints on the site and the single ownership of BCN.

Whilst Full Council agreed the Draft Plan for consultation, including GA, not BCN, there was considerable support from
the public at the meeting for the BCN site following public speaking.

The current consultation should enable the Council’s Officers and Councillors to take stock of the situation. The Council is
urged to allocate the BCN site as the most commensurate, logical and appropriate place to accommodate, in particular,
further employment development but also a commensurate amount of additional much-needed housing, including a
significant proportion of affordable housing.

Site Location and Description
The site lies between Guildford to the south-west and Woking to the north. The site has good access to the highway
network with the B2215 leading directly onto the A3 at Ripley and just one junction up the A3 is junction 10 of the M25.

The site is currently a partly previously developed commercial employment site with surrounding greenfield land
comprising approximately 10.6 hectares in size. It lies within the Green Belt, but adjacent to the existing settlement of
Burnt Common and Send Marsh.

It is overgrown unused land surrounding the relatively large scale commercial warehouses at present. It is enclosed by tree
belts and the old A3 London Road to the north and east, tree cover and the A3 to the south with hedgerows and housing
lining the Clandon Road (A247) to the east. Urban influences are provided by the residential properties to the east on the
Clandon Road, and the existing central commercial uses to the centre and the west (a 5000 square metre warehouse/
industrial estate and an auction centre respectively), as well as the new and old A3.

The overall land holding is not subject to any statutory or non-statutory landscape designations, or cultural or heritage
designations. A disused public footpath lies to the east, this previously extended southwards, however the construction of
the A3 severed this route and it has been formally extinguished.
The subject site is situated to the south of London Road (B2215), which was formally part of the A3. It is bordered to the south by the current A3, with a small area of ancient woodland adjacent and separating the site from the A3.

The site is located directly off the little used but very safe southwest bound carriage of the B2215. A safe highway access from the site onto this road already exists.

The character of the area surrounding the site is a mix of residential and commercial. Central to the site is an existing depot, which provides 5,110sqm of commercial space that is currently utilised by three businesses operating under Use Class B1/B2/B8. Further to the west is an auctioneers. Therefore, to the centre of the site, and further to the west, the nature of activity is commercial. However directly adjoining the site to the east are residential dwellings which form part of Burnt Common/Send Marsh and this character extends north and eastwards. Therefore, the character of the area directly adjoining the site (already identified as being suitable for residential development) is strongly influenced by the residential dwellings of Burnt Common, in particular those of Clandon Road, which lie directly to the north and east of the site.

Site ownership
The BCN site is in one ownership - Burnt Common Nurseries Ltd., operated by the Newship Group. The wider allocation including the Ewbank auctioneers is clearly in separate ownership. As previously explained, the 7000 square metres of commercial floorspace and approximately 100 homes can satisfactorily be accommodated without that land, effectively being accommodated around the existing 5,110 square metres of existing employment warehouse and industrial development.

Site sustainability
A key consideration in assessing whether a site is suitable for residential use is the need to ensure that the site is located in a location that is sufficiently sustainable for the level of development envisaged.

The NPPF places a presumption in favour of sustainable development, and on the basis of the Council’s own conclusions in the GBCS the application site is not an unsustainable one. This Study gives the site a sustainability score of 5.25 and a sustainability ranking of 26 and as such the site is considered to be moderately sustainable, falling approximately in the middle of the ranking system devised in the GBCS.

Burnt Common/ Send Marsh has been classified as a village in the settlement hierarchy stated in the Draft Borough Local Plan: Strategy and Sites (2014). Policy 9 of the Draft Local Plan explains that ‘Development should help support the present and future economic, environmental and social sustainability of the rural settlements, commensurate to their size, character and function.’

Thus, the Council considers the village can accommodate future development, commensurate to its size, character and function.

Turning to the site specific characteristics of the application site, it is in a sustainable location given its size, character and function. As explained in more detail later in this representation, the size of the site is appropriate to the existing scale of the village and its character. A significant part of the site is also already in use for employment purposes and the proposed allocation is for additional small and medium-sized commercial units to the south-west of the existing industrial unit and up to 100 dwellings on land adjacent to the existing village.

Given the need for new housing sites in the Borough (see later section) the assessment that is given in the Council’s GBCS and the attached landscape and visual appraisal, it is considered to be suitable for the proposed development. The site is accessible by public transport, walking and cycling and benefits from pedestrian and cycle access to a range of local services and facilities. The centre of Send Village, which has numerous shops and local facilities/amenities, is within 2km from the site, with Send/ Ripley health centre and pharmacy only 500m from the site, and this is acknowledged by national policy as being an acceptable walking distance.

There are a number of bus stops within 400-500m of the site. Bus services 462 and 463 together provide an hourly service Monday to Friday between Woking and Guildford and also serve the residential areas of West Clandon, Send Marsh and Old Woking. Bus service 515/ 515A also provides an hourly service between Guildford and Kingston-upon-Thames Monday to Sunday.
In terms of a railway station, the main line station at West Clandon is approximately 2.5km to the south of the site and linked with the site by bus service 463. This station benefits from regular services between Guildford and London Waterloo. Guildford and Woking railway stations, which are accessible by bus services 462 and 463 are on the fast line to London Waterloo, Basingstoke, Portsmouth and Alton. Existing rail facilities provide the opportunity to travel to the site by train as part of a linked bus or cycle journey.

There is an existing footpath on the northern side of the B2215, which provides connections to nearby bus stops and continues to other local facilities available in the vicinity of the site. There is also an existing on-road cycleway on both sides of London Road, which continues along the B2215 Portsmouth Road and provides a local connection to the centre of Ripley. A dedicated cycle route also runs alongside the A3 leading south-west towards Burpham (approximately 3.5km away), where it links to the wider cycle network around Guildford. There is a further shared pedestrian/cycle link along the A247 between Burnt Common roundabout and local amenities in Send. To the south-east a further cycle link runs east along Tithebarns Lane connecting to a wider cycle network towards West Horsley. The site therefore benefits from good pedestrian and cycle connections.

The following local amenities are located in close proximity to the site – a petrol station with a Little Waitrose convenience store approximately 100m from the site, a doctor’s surgery and pharmacy 500m away. Further convenience stores, newsagents, takeaway restaurants, a café and a post office are located in Send village (via Send Barns Lane), approximately 2km away. Further amenities are available at Ripley High Street which is 3km away.

In addition to this the site is within easy access of both the A3 and M25, with the B2215 providing direct access to both.

The sustainability credentials of the site and its proximity to the facilities of Send have undoubtedly contributed to Burnt Common/Send Marsh being classified as a village. With all of this in mind it is considered that the site is sustainably located and therefore accords with the principle of sustainable development in this regard.

Indeed, the ‘Send Marsh and Burnt Common – Major Village Expansion’ review carried out as part of the Green Belt and Countryside Study (2014), considered the sustainability credentials of both sites as existing (as well as two other local sites). Significantly, it ranked the Burnt Common Nurseries site in first place whilst the Garlick’s Arch site was ranked in last place.

As such, it is apparent that the Burnt Common Nurseries site is preferable in terms of its sustainability credentials.

The provision of two new slip roads at the A3 as part of the Garlick’s Arch scheme could also be considered as being contrary to the principles of encouraging travel by non-car modes, as advocated in the NPPF.

Need for commercial development
In August 2014 Lambert Smith Hampton (LSH) prepared a statement on the need for small industrial and commercial units within the Borough. This statement is attached to this representation for information. The statement found that the existing stock of buildings is very low and insufficient to meet future needs. In addition to this, a large area of land at Slyfield (known as the Slyfield Area Regeneration Project) has yet to materialise. Thus, LSH concluded that there was insufficient employment land supply to meet future growth needs and so new employment sites must be found in the Borough. Finally, the statement indicated that the Burnt Common Nurseries site would be a suitable location for small/medium sized units due to its proximity and accessibility to the principal road network.

The site was allocated in the Draft Local Plan (2014), which makes provision for at least 21ha of employment land to help support the economy. Up to 55,000sqm of employment floorspace is identified as required around villages (see Table 1 of the Draft Local Plan: Strategy and Sites, 2014). The Plan explains that this is a higher level of development than experienced in Guildford during the previous Plan period and represents an increase in employment floorspace.

In allocating the site, the Council found that:

Land to the west of the existing warehouses is suitable for new employment uses (Use Classes B1c, B2 and B8); and

That if new homes are not provided, the whole of the site is suitable for new employment uses.

Thus, the land was assessed and considered suitable for employment development.
Since the statement by Lambert Smith Hampton the Council has resolved to plan for a higher amount of employment land than noted in the Lambert Smith Hampton statement. The majority of the proposed new employment floorspace is now allocated in urban extensions to Guildford and at the former Wisley airfield. These are strategic locations that will take many years to come forward. Thus, the supply of suitable, modern employment floorspace would continue to be constrained, affecting supply. This has a knock-on effect on the creation of jobs, which impacts upon the local economy. At a time when there is a significant increase in the quantum of residential development, pursuing such a policy is at risk of being in conflict with the objectives of sustainable development.

Lambert Smith Hampton is in the process of further updating their report but in the meantime they have provided the attached letter which concludes that supply has diminished further since 2014 and demand is still solid so the need is even greater at the present day.

Re-allocating the land at Burnt Common Nurseries facilitates the early delivery of employment floorspace that has been demonstrated to be urgently needed. Provision of the units would contribute to the objectives of sustainable development by helping to meet the existing need for industrial and warehouse floorspace and facilitate job creation opportunities at an early stage in the Plan period.

Need for deliverable housing sites in Guildford

Of considerable importance when considering the principle of residential development at the site is the need to deliver housing (particularly affordable housing), to meet local needs. This is a top priority for both national Government and Guildford Borough Council.

Paragraph 47 of the NPPF requires LPA’s to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years’ worth of housing against their requirements. At the present time the Council does not have a 5-year supply of housing and is unlikely to be able to meet this target for some years. As a result, a site that can quickly deliver new dwellings in a manner that is compliant with or exceeds policy requirements in all other respects should be a very strong candidate for allocating in the emerging Local Plan.

The NPPF makes it clear that local authorities should provide an additional buffer of 5% on their 5-year housing supply requirements, which should increase to 20% for Boroughs which have a persistent under delivery of housing. Therefore, the NPPF places a more onerous requirement on local authorities to provide for an adequate supply of housing. The Council have acknowledged this, and have also accepted that it cannot meet all of its housing need from within the Borough’s urban and settlement areas. As such it has allocated sites from within the Green Belt and countryside beyond the Green Belt that could help to meet the deficit between need/demand and supply. A significant number are large sites, which will take years to deliver new housing in sufficient numbers to address the current shortfall.

An example of this is the new settlement at Wisley (on the former airfield), which is allocated for over 2,000 homes. A planning application was recently refused for mixed use development on this site. One of the (many) reasons for refusal was that:

‘It has not been demonstrated that the development proposed would not give rise to a severe adverse impact on the safe and efficient operation of the strategic road network (A3/ M25), nor that it would not give rise to a severe impact to the efficient operation of the local road network.’

It is not and will not be possible to demonstrate the proposed development at Wisley would not give rise to a severe adverse impact on the safe and efficient operation of the strategic road network (A3/ M25) until such time as Highways England implement plans to improve junction 10 of the M25.

A scheme to improve the M25 Junction 10/ A3 Wisley interchange is identified in the Department for Transport’s Road Investment Strategy for the period 2015-2020. Highways England confirm that there is currently no project team and that the improvements are not due to begin until after 2020.

Thus, it is not possible to bring forward strategic development at Wisley prior to 2020.

As a result, should other strategic sites in the Green Belt (such as Wisley) not be allocated for development, the Burnt Common Nurseries site becomes all the more relevant and necessary to enable the Council to achieve its objectives.
The NPPF seeks to boost significantly the supply of housing (paragraph 47), with paragraph 49 stating that ‘Housing applications should be considered in the context of the presumption in favour of sustainable development.’ To achieve this, the NPPF states that ‘local authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible’ (paragraph 187). When assessing and determining development proposals the NPPF makes it very clear that local authorities should apply the presumption in favour of sustainable development (paragraph 197) and that where the development plan is absent, silent or relevant policies out-of-date planning permission should be granted (paragraph 14).

For the reasons identified in the preceding section of this report the site is considered to meet sustainability objectives and therefore residential development of the identified land would compromise sustainable development.

It is clear that Guildford Borough is facing a significant long term under-supply of new housing to meet its objectively assessed needs.

Given the Council will not have a 5-year supply of housing for some years is a serious situation that requires intervention in a range of areas. Government policy clearly requires local authorities to make provision for significant increases in housing supply; however there is no reasonable prospect of achieving this in Guildford for the foreseeable future without casting the net wider and considering sites that are currently outside of the urban and settlement areas. When this is the case the policy of national Government (as contained in the NPPF) is that development proposals for housing, which comply with the principles of sustainable development, should be considered favourably.

Notwithstanding the above, the proposal can be delivered very quickly due to the lack of site constraints, the fact that the BCN site is all in one ownership, there is an existing access onto the road network (B2215), development of the site would have a very limited impact on the local landscape and Green Belt (due to its heavily enclosed nature) and would enable the openness of the Green Belt and its open character to remain and continue throughout the Plan period.

Finally, also in accordance with sustainable development objectives, the emerging Local Plan seeks to support the future economic, environmental and social sustainability of rural settlements, commensurate to their size, character and function.

The scale of the proposed development on the BCN site is commensurate with the size, character and function of Burnt Common/ Send Marsh. The settlement is a village and increasing its size by 400 dwellings is potentially excessive in relation to the size of the village. This is demonstrated in a number of ways. Firstly, population; there is an existing access onto the road network (B2215), development of the site would have a very limited impact on the local landscape and Green Belt (due to its heavily enclosed nature) and would enable the openness of the Green Belt and its open character to remain and continue throughout the Plan period.

Secondly, land take; the proposed allocation at Garlick’s Arch is some 31.7ha. This is close to 50% of the land area of the existing village. Once again, it is simply not possible to conclude that this is commensurate with or proportionate to the size of the village.

Thirdly, the provision of services and facilities; whilst there are local services and facilities the addition of a population of close to 1,000 people would have a significant impact upon those facilities. In allocating land at Garlick’s Arch for such a scale of development without having first considered the need for improvements to local services and facilities and so on is contrary to the aim of sustainable development and contrary to the Council’s own emerging Plan.

That is not all, however.

Policy 9 of the Draft Local Plan goes on to explain that ‘… all development should be appropriate in scale and design, having regard to each settlement’s identity, countryside setting and local character and distinctiveness.’

As discussed in detail in the accompanying landscape appraisal, the Garlick’s Arch site would potentially have a significant adverse impact on the identity, countryside setting and local character and distinctiveness of the Green Belt and the village. This renders it contrary to the objectives of sustainable development and the policies in the emerging Local Plan.

The above evidence weighs very heavily against the allocation of the Garlick’s Arch site for development in the Submission Local Plan.
The above evidence weighs very heavily in favour of the allocation of the Burnt Common Nurseries site for development in the Submission Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 160718 LVA Report Appendices for Burnt Common Nurseries.pdf (5.1 MB)
- 160718 Highway Appraisal 3206 TN01 B.pdf (619 KB)
- 160718 Burnt Common Nurseries Local Plan Representations letter.pdf (439 KB)
- 160715 BCN Consultation Questionnaire and Comments Form.pdf (278 KB)
- 160718 LVA Report for Burnt Common Nurseries.pdf (387 KB)
- 160715 BCN Lambert Smith Hampton Letter.pdf (99 KB)

Comment ID: SQLP16/1924  Respondent: 15674561 / Andy Stallan (WYG)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Allocation of Sites - Burnt Common Nurseries site should be allocated in the Submission Plan

Please refer to the accompanying separate representation submission letter dated 15th July 2016 for details

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160713_LP1_Representation_on_behalf_of_the_NRA_DRAFT_002_2 (1).pdf (287 KB)

Comment ID: SQLP16/1925  Respondent: 15674561 / Andy Stallan (WYG)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The owners of the Burnt Common site consider that the BCN site should be in the submission local plan as an allocated site, for the reasons set out in the accompanying WYG representation letter dated 15th July 2016. They reserve their right to participate in the examination depending on the outcome of the current consultation and the content of the submission local plan. The purpose of participating in the examination will be to test the content of the plan, particularly in relation to the BCN and GA sites but not solely, and demonstrate to the examination inspector that the plan is not sound without the inclusion of the BCN site as an allocated site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160713_LP1_Representation_on_behalf_of_the_NRA_DRAFT_002_2 (1).pdf (287 KB)

---

Comment ID: PSLPA16/4231  Respondent: 15674689 / Chris Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C). There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

I object to the infrastructure schedule because of the lack of accurate and unverifiable costs of the proposed infrastructure improvements. It is not clear or guaranteed that developers will commit to the costs required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4230  Respondent: 15674689 / Chris Baker  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the figure of 693 houses per annum in the borough being too high (Appendix D) The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans. There is a lack of transparency in the SHMA report and therefore the figure cannot be independently verified.

I object to the proposed 693 houses per annum as this report was made before the result of the EU referendum. The resulting reduction of European immigration to the South East of England will reduce housing demand.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7849</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7845</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In particular, the site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7848</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43) Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- It has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7847</th>
<th>Respondent:</th>
<th>15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). All traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17269</th>
<th>Respondent:</th>
<th>15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17277</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the proposed level of new house development within the villages of Ockham, Ripley, Send and the Horsley as it will not compliment the existing village and community way of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17268</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17273</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Local Plan as the development proposed is not sustainable and the current and proposed infrastructure will not be able to cope with the development of at 13,000 new houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17278</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object as Thames Water have advised Guildford borough council that the current wastewater network is unlikely to be able to support the demand anticipated from all of the developments listed in the local plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object due to the congestion that developments proposed will cause to the local village roads and the lack of road infrastructure (Policy II) and within the draft local plan there are no plans to improve that.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17280</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the size of the proposed housing development as there are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17280</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the local plan because the National planning policy framework requires that new residential development MUST respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object as the Local Road network, particularly around the villages of Ockham and Wisley, cannot cope with the current local traffic within the area. Most of the local roads are single lane.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2) The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the proposed housing developments at Wisley Airfield (A35) and Garlick’s Arch (A43) as they have very limited public transport facilities ie; no railway stations and inadequate bus services, which will therefore lead to increased levels of private car use.

I object to the developments at Wisley Airfield, Garlick's Arch and within the Horsleys villages as the car parks at the railway stations of Horsley and Effingham at already at capacity.

I object to the plan as it lacks detail for a cycle infrastructure which might mitigate increased private car use.

I object to the local plan as these developments should be in urban areas where there is sustainable transport.

I object to the local plan as the increased levels of NO2 and PARTICULATES in the air may cause SIGNIFICANT health risks to the adults and children living within the strategic sites and proposed high density levels of development within the Ockham, Send, Ripley and Horsleys villages.

I object as the levels of Air quality pollutants produced by the construction and then the increased local traffic are likely to breach European rules and regulations and therefore leave the council and therefore the council tax payer liable to fines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17274  Respondent: 15674689 / Chris Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17272  Respondent: 15674689 / Chris Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17275</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to development in areas which are at risk of flooding (Policy P4) and the plan does not take adequate account of flood risk as required by National Planning Policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17276</th>
<th>Respondent: 15674689 / Chris Baker</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object as the Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and the Horsleys. 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Attached documents:

Comment ID: PSLPP16/17281  Respondent: 15674689 / Chris Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object as over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7862  Respondent: 15678593 / Mole Valley District Council (Deborah Miles)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Highways

Development at Wisley Airfield would give rise to a significant increase in vehicle movements. The nearest principal road, the A3, and other nearby trunk routes, M25, A317, A319, are all heavily congested. It is therefore likely that traffic will seek to make use of less congested routes, particularly at peak periods, encouraging ‘rat running’ and avoidance activities on the local rural road network to the south of the site, and southern roads such as the A246. Significant additional traffic on these roads would have an adverse effect on land within Mole Valley. MVDC is pleased to note that the requirements section to policy A35 (Land at former Wisley Airfield) has identified a number of works that will need to be done in order to improve the road network. MVDC would also ask that a Traffic Impact Study which includes mitigation measures should be submitted as part of any application.

A number of sites are earmarked for development within and around the edges of West Horlsey, East Horsley and Clandon. As with MVDC, the rural areas around Guildford are heavily constrained and the majority of new development has to be accommodated on smaller sites which makes it difficult to phase development and ensure the provision of infrastructure
and services is in line with the rate of building. MVDC would ask that GBC are aware of this as and when applications begin to come forward, especially given the potential impacts identified as the Wisley Airfield development goes forward.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7863</th>
<th>Respondent:</th>
<th>15678593 / Mole Valley District Council (Deborah Miles)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

**Flooding**

The Wisley Airfield site is identified as being partly in Flood Zone 3. MVDC would expect this to be taken into account when assessing a planning application on the site and that any Flood Risk Assessment would take measures to mitigate flooding in the wider area.

**Education**

MVDC have previously raised concerns that the development of the Wisley Airfield site had the potential to put additional pressures on the need for secondary school places both in GBC and MVDC. Of particular concern was pressure on places at Howard of Effingham School which would result in cross-boundary issues, particularly for residents in Bookham, for whom Howard of Effingham is the most popular local secondary school. Given the above MVDC are pleased to see the allocation of a secondary school within the Wisley Airfield site, as well as a primary school as previously proposed.

The Surrey School Organisation Plan does predict a steady rise in the need for secondary school places in Guildford over the next 10 years. Therefore, MVDC would ask to be kept appraised of the potential for development at this site, and that GBC consults with Surrey County Council so that county wide pressures can be taken into consideration.

**Health**

The allocation at Wisley Airfield will result in a significant increase in the local population, and it is noted that no specific provision has been made for primary health care. MVDC would expect GBC to consult with both Guildford and Waverley and Surrey Downs CCGs in order to address any cross-boundary issues that may result in a deficit of primary health care places in MVDC, specifically Bookham where the draft NHP has identified an existing need.

It may be beneficial if any consultation on this topic would include NHS England South East Region and that development aligns with the strategic transformation plan as agreed by the Surrey Heartlands Collaboration which includes social care and health.

**Waste**

The comment in Key Considerations of policy A35 (Land at former Wisley Airfield) regarding the waste allocation in the corner of the site is noted. It would be expected that consultations with Surrey County Council would be carried out regarding the need for alternative locations if required.

Upgrades to Thames Water waste water treatment works were mentioned in the refusal of the original planning application
on the site. It would be expected that consultations with Thames Water would continue on this matter and that the upgrades would be carried out in time to support any proposed development and mitigate any impact on provision outside GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17321  Respondent: 15678593 / Mole Valley District Council (Deborah Miles)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Retail/Employment

Guildford is within commuting distance of MVDC by both car and train. Seeking to create strategic employment sites may be beneficial to Mole Valley residents as it would offer wider employment opportunities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1933  Respondent: 15678593 / Mole Valley District Council (Deborah Miles)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulation 19

Thank you for consulting Mole Valley (MVDC) on the Draft Guildford Borough Council (GBC) Local Plan.

Given the size of the Wisley Airfield site it has the potential to have an impact on Mole Valley District, and as such we have an interest in the development of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to offer my strongest objections to the proposed new housing as detailed in the Council’s above plan.

The proposals are in direct conflict with most of the points in Section 9 of the National Planning Policy Framework which makes it very clear that Green Belts are to be protected. There has been no case made by the Council for the “exceptional circumstances” that are required to remove land from the Green Belt. I’m sure that Guildford Borough is aware if this government document, but as a reminder here is a link to the Green Belt guidance:


The proposed “insetting” contradicts the Plans own policy P2 which states that “We will continue to protect the Metropolitan Green Belt against inappropriate development”. It is absurd that the council considers high density housing developments in Horsley as consistent with policy P2. The proposals even contradict the Guildford Borough Economic Strategy 2013-2033 which makes no case for large numbers of new homes in Horsley or surrounding villages.

The infrastructure of the two Horsley’s is already at capacity in terms of drainage, schools, shopping, parking, bus transport, traffic flow, station parking and medical facilities. The Plan does not address or even acknowledge the need for infrastructure improvements. Indeed, even if there were clear infrastructure plans, where would these new facilities be located if not at the loss of yet more Green Belt land?

As a resident of West Horsley, I know that the idyllic rural character of both the Horsley’s would be destroyed forever. I moved here from London specifically because of its rural, countryside character and the threat of having this ruined is horrifying to me and my neighbours. To expect West Horsley to absorb a 35% increase (the highest in the borough) in houses, population and the resultant impact on already stretched infrastructure is unwise, unworkable and contrary to published planning guidelines and I therefore urge the Council to withdraw the plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Draft Policy Al: The Plaza, Portsmouth Road, Guildford

Pegasuslife is the landowner of the Site identified in draft Policy Al with a draft allocation for approximately 70 dwellings (Use Class C3). The extent of the Site is identified on the plan accompanying Policy Al. The Site has been the subject of significant pre-application discussions with your Officers for proposed development to provide assisted living accommodation for older people with communal facilities and health and wellbeing facilities. The Council concluded that the proposed development is a Sui Generis Use Class in September 2015.

A planning application was subsequently submitted to GBC in April 2016 on behalf of Pegasuslife and is currently subject to determination, for the provision of:

Proposed assisted living accommodation for older people (sui generis) comprising 103 apartments and communal facilities including; residents lounge, guest suite, health and well-being facilities, restaurant, staff offices, surface and basement car parking, cycle parking, bin storage, plant room, associated hard and soft landscaping, and groundworks.

On behalf of Pegasus life, we support the principle of draft Policy Al, which confirms the acceptability for redevelopment at the Site for residential purposes. However, we object to the sole allocation of the Site for residential use (Use Class C3) and consider the Site should instead be allocated for residential (Use Class C3) and/or assisted living accommodation for older people (Sui Generis).

Assisted living accommodation for older people is considered to be an entirely appropriate land use given the Site's location within the Town Centre. The Site has good levels of accessibility via walking, cycling and public transport modes. Both Guildford Railway Station and Guildford Bus Station are within an 8 minute walk from the Site.

The number of older people in the UK is growing and the HAPPI 3 Report1 (June 2016) states that the number of people aged 80 and above will more than double by 2037 and the number of people aged over 90 will triple. The number of centenarians (i.e. those older than 100 years old) shows an increase of sevenfold in estimates from 14,450 in mid-2014 to 111,000 in mid-2037.

In the light of the rate of change, it is not surprising that there is a chronic undersupply of suitable housing for older people in the UK with retirement properties making up just 2% of the housing stock (approximately 533,000 homes). To put this into perspective, the over 65 population is approximately 10 million and the over 60 population is approximately 14 million. Evidently, the demand for suitable housing for older people significantly outweighs the supply.

The ONS Annual mid-year population estimates (2014) for the UK (published in June 2015), estimates a rise in the medium age of the population to 40-years (the highest ever estimated) as the number and therefore proportion of older people continue to rise, up 0.3% in a year. This only reinforces the need for a response to the crisis.

Accordingly, the NPPF (para 50) encourages a wide choice of quality homes that widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local Authorities are required to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. This includes older people and people with disabilities. The revisions to the Planning Practice Guidance (PPG) (March 2015) strengthen the requirement for LPAs to plan and provide housing for older people.

Paragraph 4.2.7 of the PSLP confirms that self-contained accommodation for the elderly will contribute to GBC’s local housing requirement. The sustainable location of the Site therefore makes it appropriate for this land use to make an important contribution to local housing need.

Paragraph 4.2.8 recognises that efficient use of land is essential and certain areas can accommodate higher densities. The Site is sustainably located within Guildford Town Centre and perfectly placed to accommodate higher densities. We therefore object to the allocation of approximately 70 dwellings. Notably, no evidence has been presented to support the proposed quantum of 70 units. In this regard, the Policy is not 'Justified' and therefore is "unsound" in this regard (NPPF, para 182).
We consider that the Site can accommodate approximately 90-100 dwellings, which is in line with the PegasusLife's proposed response to consultation feedback received for the proposed development. It is considered appropriate that dwelling range is provided in order to be flexible and respond to prevailing circumstances.

We continue to support the requirement within draft Policy Al that development proposals must be sensitive to the scale and heights of nearby Listed Buildings, and views of the church tower (St Nicholas Church).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17335</th>
<th>Respondent: 15679041 / Barton Willmore (Emma Wreathall)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Draft Policy H2: Affordable Homes

Draft Policy H2 requires that on sites providing five or more homes, or sites of 0.17ha or more, that 40% are to be affordable. The 'reasoned justification', for this draft policy states at paragraph 4.2.35:

This policy applies to all new homes within the C3 Use Class. This generally includes retirement homes, as well as self-contained studio flats for a single household, whether specifically aimed at students or not. It does not apply to residential institutions such as care homes and nursing homes. Assisted living and other sui generis residential developments may be required to make provision; these will be considered on a case-by-case basis.

We object to this draft policy as currently drafted since it does not take into account the viability or provide certainty for emerging models of accommodation and care for older people, such as the presently proposed development of the Site. The draft Policy is therefore not considered 'Effective' in this regard, and therefore fails this test of "soundness".

Assisted living accommodation for older people generates additional costs relative to residential development (Use Class C3) due to the need for specialist design and specification, the sacrifice of saleable area for the provision of services and facilities with no compensating income, and other differentiating factors. Land must be competed for on the open market with key competition including non-specialist housebuilders, student housing developers and commercial developers. Inevitably, in reaching a competitive land value an affordable housing provision equal to that assumed by non-standard housebuilders bidding on the site cannot therefore be sustained.

This is a structural issue which affects the delivery of assisted living accommodation for older people at a strategic level. Not looking to achieve parity of affordable housing provision between specialist and mainstream developments is essential to supporting efforts to boost the supply of housing in this sector in line with both national and local priorities. Owing to the further increased costs of redevelopment on previously developed sites, it is therefore considered that Policy H2 should not apply to assisted living developments on previously developed land.

Next Steps

I trust the above is of assistance and request that the submitted Local Plan is updated to reflect these comments on draft Policies Al and H2. I would be happy to discuss with GBC Officers in more detail if requested.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** SQLP16/1936  **Respondent:** 15679041 / Barton Willmore (Emma Wreathall)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

**GUILDFORD BOROUGH LOCAL PLAN**

**PROPOSED SUBMISSION: STRATEGY AND SITES 2013 - 2033**  **WRITTEN REPRESENTATIONS ON BEHALF OF PEGASUS LIFE**

These representations have been prepared on behalf of our Client, Pegasuslife, and set out comments in response to Guildford Borough Council's (GBC) Proposed Submission Local Plan Strategy and Sites consultation (PSLP, June 2016).

These representations have been prepared in objective terms and assessed against the prevailing planning policy framework, namely paragraph 182 of the National Planning Policy Framework (March 2012) that requires a Local Planning Authority to produce a Plan that is:

- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategy priorities; and
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/4245  **Respondent:** 15679137 / Turley (Hannah Bowler)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Introduction

These representations have been prepared by Turley on behalf of Markfield Investments Ltd in relation to ‘Land at Dunmore Farm’, which is being promoted through the emerging Local Plan. Previous representations have been made to earlier stages of the Plan-making process regarding the site.

This response focusses on matters pursuant to the soundness of the draft Plan and those which are of particular relevance in the context of our Client’s interest. For the most part these responses relate to:

- Land at Dunmore Farm;
- Settlement Hierarchy;
- Housing Need considerations;
- Green Belt release; and
- Strategic Site allocations.

In addition, the representations set out the merits of our client’s site, land at Dunmore Farm, which could contribute to delivering the strategic objectives of the draft Local Plan, in addition to, or instead of, sites currently being proposed.

Land at Dunmore Farm

These representations should be read in the context of the opportunities for the site to be delivered as a comprehensive development in association with the former allocation at ‘land adjoining Fairlands’. The site itself has not been identified at any previous stage of the Local Plan process, although is located directly to the south of the former safeguarded allocation at Fairlands which was considered within the Regulation 18 Local Plan consulted on in July 2014.

Our client’s landholding ‘Land at Dunmore Farm’ comprises 31.69 hectares of land as submitted in previous representations to the Local Plan. The site currently comprises farmland and paddocks with a limited number of existing buildings in the south eastern corner around Dunmore Farm. The site wraps around the former safeguarded allocation to the south-west, south and south-east of Wood Street village. The field parcels themselves are relatively clear internally with trees and hedgerows indicating the majority of the boundaries.

Throughout the plan process to date, our client has supported the inclusion of the Fairlands allocation within the plan, although wishes to further emphasise the wider opportunities for the area if the site were to be considered alongside Fairlands for allocation within the Local Plan.

- A comprehensive development that would provide not only market but affordable housing to meet the needs of the Borough and any unmet requirements from Woking Borough;
- Deliver a comprehensive masterplan that could incorporate a defensible landscape buffer which would ensure the permanent separation of the villages of Fairlands and Wood Street village by creating new defined edges to the settlements. This would reinforce the findings of the Green Belt Study 2013;
- Direct new development in a sustainable location in line with the settlement hierarchy and enhancement local facilities and public services;
- Provide new development in locations where growth will be required to support the continued economic growth of Guildford as a town centre;
- The potential to incorporate appropriate Suitable Alternative Natural Greenspace to offset the proximity of the site to Thames Basin Heath SPA.

In light of the development potential of the site either as a small scale Green Belt release to the north of Wood Street village or in conjunction with any potential allocation at Fairlands, there are a number of key considerations that arise from
the draft Local Plan as currently written that undermine the overarching strategy of the Plan. These are considered to be fundamental to the soundness of the Plan when considered against paragraph 185 of the National Planning Policy Framework (NPPF). The following are discussed in more detail below:

- Settlement Hierarchy
- Housing Needs; and
- Green Belt

**Settlement Hierarchy**

The Settlement Hierarchy Background Paper (May 2014) has informed the overarching strategy towards directing development within the draft Local Plan. The current Local Plan 2003 identifies both Fairlands and Wood Street village as settlements within the Borough and this designation has been re-assessed through the 2014 paper.

It is evident that Fairlands and Wood Street Village rank similarly with regard to the provision of services being ranked as 10 and 12 respectively of all settlements within the District. It is worth noting that Wood Street Village accommodates a higher population than 21 other settlements within the Borough.

The settlement hierarchy identifies that both Fairlands and Wood Street village are large villages below the larger urban area of Guildford, Ash and Tongham and East Horsley. Paragraph 6.2 of the paper discusses how it would be appropriate to direct new development towards the following settlements - Guildford Urban Area, Ash and Tongham Urban Area, East Horsley together with West Horsley (North and South), Shalford, Chilworth, Effingham, Send, Send Marsh/Burntcommon, Ripley, Fairlands and Wood Street Village.

The paper concludes that ‘directing growth to these settlement is in accordance with the national policy which states that “planning policy should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and further focus significant development in locations which are, or can be made sustainable”’.

Appendix C of the statement further sets out that Wood Street Village provides a range of facilities including shops, infant schools, local church, village hall, restaurants and a post office. In comparison, Fairlands also provides similar facilities as well as a primary school, GP surgery and Dentist.

Given the above, it would be appropriate for GBC to consider development opportunities at both villages given their sustainability credentials to meet long term housing and economic needs, both within and beyond the plan period.

In addition, the proximity of the site to Guildford urban area which is the focus of considerable economic growth over the plan period should not be understated. The opportunity for a comprehensive development at Wood Street Village (north extension) and Fairfield (western extension) could assist in meeting Guildford’s local term housing requirements. The delivery of housing would need to balance against a sensitive design approach that would ensure that a permanent landscape buffer is created to ensure long term retention of the individual identities of each settlement. In addition, local infrastructure could be enhanced with a focus on further improving the public transport links to the Guildford.

Given the findings of the Settlement hierarchy report, it is unclear as to why GBC are pursuing strategic development allocations within settlements which scored significantly lower within the sustainability rankings with regard to local facilities and public transport accessibility. It is noted that Normandy (small village) and Flexford (Medium village) are proposed to deliver strategic extensions despite supporting evidence suggesting alternative development locations would be preferable.

As such, it is considered that GBC are not ‘actively managing patterns of growth; nor focussing ‘significant development in locations which are or can be made sustainable’ as required under paragraph 17 of the NPPF.

Whilst it is acknowledged that some sites may fall outside the Green Belt and be the first preference for development, there is a requirement under paragraph 14 of the NPPF for Local Plan to meet its OAN, ‘with sufficient flexibility to adapt to rapid change’ and also assist in supporting the ‘viability and vitality’ of the communities in the villages.

In this regard, GBC has not directed development towards the most sustainable settlements where the need for travel to key employment locations is minimised. GBC should reconsider development opportunities around the settlement of Wood...
Street village and Fairlands for either small scale Green Belt release or for wider strategic allocations which would be supported by the conclusions of the SA.

As such, the approach taken fails to adopt the most appropriate strategy and nor is it consistent with the requirement to achieve sustainable development as required under paragraph 182 of the NPPF.

**Housing Need**

The Spatial Vision of the draft Local Plan sets out at draft policy S2 that the plan will deliver 13,860 between 2013- 2033. The focus of new development is on existing brownfield sites and at villages which are inset within the Green Belt.

The West Surrey Strategic Housing Market Assessment (September 2015) covers the areas of Guildford, Waverley and Woking Borough Council and sets out housing needs between 2013-2033.

The requirements are as follows:

<table>
<thead>
<tr>
<th></th>
<th>Guildford</th>
<th>Waverley</th>
<th>Woking</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings per annum</td>
<td>693</td>
<td>519</td>
<td>517</td>
</tr>
<tr>
<td>Total over the plan period</td>
<td>13860</td>
<td>10380</td>
<td>10340</td>
</tr>
</tbody>
</table>

Whilst it is recognised that Guildford are seeking to meet its OAN over the plan period, the Duty to Co-operate Statement (June 2016)(DtC) discusses that whilst Guildford and Waverley are seeking to meet its OAN, Woking is intending to deliver only 292 dwelling per annum against a requirement of 517 dwelling per annum. As such there is a requirement for 225 dwellings per annum between 2012-2027, which in total is 3,150 homes to be accommodated by neighbouring authorities.

Given the requirement for local authorities to undertake the duty to cooperate as set out in paragraph 178 of the NPPF, which requires that public bodies need to invoke the duty through ‘planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities’ (paragraph 178). As housing is considered to be a strategic priority there is a requirement upon GBC to fully consider opportunities to assist by taking up the unmet need of neighbouring authorities.

Whilst the emerging Local Plan will provide a buffer of 1,984 dwellings within the plan above the OAN requirement through completions since 2013 and outstanding capacity, this only seeks to incorporate flexibility within the plan to accommodate any additional needs of the Borough itself.

However, it is evident from the evidence base which underpins the Local Plan as well as the strategy contained within the Reg 18 Local Plan, that Guildford can reasonably accommodate additional new development in sustainable locations and through Green Belt release.

It is unreasonable for GBC to state at 4.43 ‘we do not consider that we can sustainably accommodate any unmet need arising from Woking’. It should be recognised that whilst WBC are yet to proceed with preparing a new Local Plan, there is still a requirement under paragraph 181 for ‘a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development’.

In 2014, GBC published its Interim Sustainability Appraisal (SA) which discussed opportunities for delivering new development through the expansion of villages by allocating greenfield sites within the Green Belt, noted as ‘Option D Green Belt sites around villages’ within the document- with reference made to safeguarding such sites until after the plan period. It should be noted that this Interim SA supported the Reg 18 Local Plan consultation in July 2014 and had initially intended to proceed with the inclusion of Green Belt release at villages and the allocations of safeguarded sites to ensure flexibility within the Plan, an option that was supported through the evidence base to the Plan.
In contrast, the updated SA (2016) which supports this draft Local Plan states that following the consultation in 2014, the volume of objection to Option D has resulted in the total quantum of growth around villages being ruled-out. However, the SA fails to fully explain and consider the appropriate locations for such growth, with no justification provided as to why development opportunities around Fairford and Wood Street village were not taken forward for allocation above sites such as Normandy except solely on public perception as noted at page 29 of the Appraisal, when the allocations are subject to the same Green Belt considerations and in fact rank lower in the settlement hierarchy. The DtC Statement further states at paragraph 4.36 that GBC ‘has sought to maximise sustainable opportunities to meet needs’, which is clearly not the case.

It is therefore unjustified for GBC to proceed with allocations within the plan when the Council has not considered all reasonable alternatives. In addition, given previously GBC had identified additional capacity for development through a range of safeguarded sites which would have ensure sufficient flexibility in the plan, the removal of sites with minimal justification and GBC stating that it is unable to meet some of WBC unmet need is unfounded and demonstrates that the plan has failed to be positively prepared.

As will be discussed in Section 4 below, GBC should also consider opportunities for smaller Green Belt releases around sustainable settlements which can support the continued economic growth of Guildford and support the long term vitality of villages around the periphery of the main urban area within the District. This will deliver flexibility within the plan period and provide more certainty that GBC will be able to deliver a 5 year supply consistently across the plan period.

Another key consideration for GBC is the current buffer proposed of an additional 1,984 dwellings which could be delivered over the plan period. Whilst the inclusion of a buffer is appropriate, this is not considered sufficient enough given the reliance on consistent delivery from a number of large scale sites within the Local Plan strategy to maintain a five year supply as required under paragraph 47 of the NPPF. These include sites at Stoke (1,000 dwellings), Gosden Hill Farm (2,000 dwellings), Blackwell Farm (1,800 dwellings), land to the south and east of Ash and Tongham (1,200 dwellings), Ockham (2,000 dwellings) and Normandy (1,100 dwellings). Given the above, GBC need to consider the inclusion of smaller sites that can be delivered earlier in the plan period.

In conclusion, it is considered the draft Local Plan is unsound as it has not:

- Been based on effective cross boundary working;
- Not been prepared positively to assist WBC in meeting some of its unmet need;
- Does not provide sufficient certainty on consistent housing delivery over the plan period given the reliance on large scale allocations; and
- Opportunities for sustainable development within the Borough have not been taken forward despite being supported through the evidence base to the draft Local Plan.

**Green Belt Release**

Whilst it is recognised that the Borough is constrained by both AONB and Green Belt, it is considered that the evidence base on which the Local Plan strategy has been derived does not meet the requirements of the NPPF.

At present, there are a limited number of sites proposed for Green Belt release despite opportunities for new development to be delivered within sustainable locations that will assist Guildford in meeting its OAN over the plan period.

The site was considered as part of parcel H8 which extend northwards between Wood Street village and Fairlands within the Green Belt. Whilst the site was considered to be of high sensitivity, Volume II of the Green Belt and Countryside Study discusses that there are ‘opportunities to accommodate appropriate development without significantly comprising the purposes of the Green Belt’. It is clear from the assessment that the main purposes of the Green Belt within this location is to:

- Check southwards sprawl of Fairlands and northward sprawl of Wood Street Village;
- Prevents Fairlands and Wood Street village from merging;
- Assists in safeguarding the countryside from encroachment; and
- Preserves the setting of Wood Street conservation area.

In this regard, given development opportunities clearly exist to the west and south of Fairlands and were supported through a previous iteration of the Local Plan, the opportunity to create a more comprehensive extension incorporating the site to
the north of Wood Street village would assist in delivering a significant quantum of homes, incorporating an appropriate and extensive landscape buffer between the two villages to ensure a defensible and permanent boundary to both villages.

The creation of a new permanent open area of land between the two settlements could deliver far greater benefits as public access could be provided along with the potential for outdoor sport and recreation which would permanently benefit the residents of both villages and the wider District. As such, this would ensure that the requirements of paragraph 81 are met, ensuring that the Green Belt is open and permanent and provides a beneficial use whilst also meeting the five purposes of the Green Belt as stated at paragraph 80 of the NPPF.

Alternatively, GBC should consider the opportunities to deliver smaller scale development at sustainable settlements such as Wood Street village, in locations where the impact on the function of the Green Belt would be minimised and opportunities to incorporate functional and accessible Green Belt land could be explored.

In light of the evidence base above and as mentioned at Section 3, GBC has through the Draft Local Plan Reg 18 consultation held in October 2014 considered opportunities for Green Belt release at Fairford in the form of a sustainable extension to the existing village. This has been subsequently removed.

The former draft wording of Policy 2 (Borough Wide Strategy) still sought to deliver 13,040 new homes over the plan period, although also quoted that ‘in addition to provide a level of flexibility and to ensure that the realigned Green Belt boundaries endure beyond the plan period, we are safeguarding approximately 99 hectares of land’. In support of this statement paragraph 4.10 included the provision for ‘safeguarded land’ which was an appropriate policy mechanism to meet the longer term development needs of the District.

This was further clarified at policy 9 (Villages and major previously developed sites) which sought to safeguard land at Fairlands, Send Marsh, Normandy and Flexford to meet longer term needs as part of a Local Plan review process and further clarified at paragraph 4.115.

However, when reviewing the Reg 19 Local Plan, it is clear that the Normandy site A46 has been taken forward as a proposed strategic allocation – no longer safeguarded for later in the plan period – whereas Fairlands has been removed entirely from the draft Local Plan as has any reference to safeguarded land. There is no justification provided as to why one site is preferable to the other and nor has regard been given to the findings of the Green Belt and Countryside Study nor the Settlement Hierarchy which should underpin the overarching strategy of the emerging Local Plan.

At paragraph 4.3.12 of the draft Local Plan, it states that Wood Street village and Fairlands are to be inset from the Green Belt, although there is insufficient evidence to justify why opportunities for growth at these larger villages has not been considered further and taken forward into the draft plan.

Given the requirements of paragraph 85 of the NPPF, when reviewing Green Belt boundaries the function of the Green Belt should not be the only consideration when determining whether development would be appropriate. As such, paragraph 85 requires that LPA’s should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

On the basis of the above, the Reg 18 Local Plan was addressing the key considerations set out at paragraph 85 and there is a sound evidence base to support this approach. GBC acknowledged within the former draft Plan that it was seeking to address the requirements of paragraph 85 explicitly which would have provided more certainty in housing delivery and ensure flexibility over the plan period.
In this regard, whilst supporting the previous approach to the Local Plan strategy consulted on in 2014, we would consider it appropriate for GBC to reconsider the inclusion of safeguarded land within the emerging Local Plan. This said, of the considerations set out at paragraph 85, it is considered that in re-adopting this approach further consideration is required with regard to the following two elements:

- Ensuring that the development boundary will not be altered at the end of the plan period; and
- Boundaries are defined clearly using physical features that are likely to be permanent.

As such, GBC should consider further the relationship of Fairlands with Wood Street village to realise the large scale opportunities for mixed use development within this area whilst reinforcing the quality and usefulness of the Green Belt between the two settlements. The delivery of new development could facilitate securing the permanence and openness of the Green Belt between the settlements and to ensure its use is enhanced and is beneficial to the local community as set out at paragraph 81 of the NPPF.

The draft Local Plan as currently written is unsound and fails to take into account the up-to-date and relevant evidence that has been published to support its preparation. The draft Plan does not seek to ‘promote sustainable patterns of development’ as required under paragraph 84 of the NPPF and nor does the plan incorporate sufficient flexibility through the review of the Green Belt to satisfy that the Green Belt boundary will not need to be altered, either through a future need to accommodate some of WBC’s unmet need, or unexpected changes to housing and employment requirements within the plan period. The inclusion of a higher housing target (incorporating a more significant buffer above the OAN) would be more appropriate, ensure compliance with the NPPF and any unmet needs arising from neighbouring authorities, and assist in the delivery of development in a sustainable location and reduce the reliance of a Local Plan review early in the plan period.

**Strategic Development Opportunities**

The settlement hierarchy notes that Wood Street Village and Fairlands are both larger villages with sufficient provision of local facilities and public accessibility. As such, GBC should be considering the longer term opportunities for the two villages and ensuring that any new development that comes forward as a longer term opportunity is comprehensively designed and delivered to ensure that the identity of each settlement is retained whilst seeking to sustain and support the vitality of the villages themselves.

Land at Dunmore Farm extends to the north of Wood Street village and would be a logical extension that could be well integrated with the existing village. The village is not only within a sustainable location and well related to Guildford, but also would provide additional flexibility within the plan with regard to housing provision if GBC is required to assist WBC in meeting some of its unmet need over the plan period.

The Fairlands allocation would have identified 27ha of land for residential development, would incorporate the provision of SANG and would provide further opportunities to deliver a strategic allocation to the west of Guildford that could incorporate appropriate landscape features to deliver a permanent Green Belt boundary between both villages with the incorporation of functional Green Belt that would deliver benefits to the wider community.

Whilst it is acknowledged that GBC is seeking to meet its OAN, there is still uncertainty over the unmet need of Woking and how this could be accommodated within the scope of the draft Local Plan if considered appropriate. We consider that a more significant housing buffer is required within the Plan given both the strong reliance on larger strategic allocations and the uncertainty of consistent delivery over the plan period and any outcome arising from the Duty-to-Co-operate. In order to be considered sound it is imperative that GBC ensure that the plan is both flexible and robust, with assurance that an early review of the Local Plan strategy will be not required if an increased housing need is necessary within the plan period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/1942  **Respondent:** 15679137 / Turley (Hannah Bowler)  **Agent:**
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>Please see supporting report for more details</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1943  Respondent: 15679137 / Turley (Hannah Bowler)  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>Please see supporting report for more details</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1944  Respondent: 15679137 / Turley (Hannah Bowler)  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>Please see supporting report for more details</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
Comment ID: SQLP16/1945  Respondent: 15679137 / Turley (Hannah Bowler)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see supporting report for more details

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1946  Respondent: 15679137 / Turley (Hannah Bowler)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see supporting report for more details

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1947  Respondent: 15679137 / Turley (Hannah Bowler)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see supporting report for more details

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/4256  Respondent: 15682305 / Monika Mundy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

I demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17383  Respondent: 15682305 / Monika Mundy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will be suffer from higher density development and the resulting increase in traffic, use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17379  Respondent: 15682305 / Monika Mundy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and I deem as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. These developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17384  Respondent: 15682305 / Monika Mundy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17380  Respondent: 15682305 / Monika Mundy  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a cut-out with the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17378 Respondent: 15682305 / Monika Mundy Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on us with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7906</th>
<th>Respondent: 15682465 / Nick Beesly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site Allocation Policies: I am in support of the development of Blackwell Farm (Site Allocation A26) being in the Local Plan but believe that it should be extended to provide for 3,000 homes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17397</th>
<th>Respondent: 15682465 / Nick Beesly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Design Policies: I am fully supportive of Design Policies D1 &quot;Making better places&quot;, D2 Sustainable design, construction and energy&quot; and D3 &quot;Historic Environment&quot;.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17398</th>
<th>Respondent: 15682465 / Nick Beesly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Design Policies: I am fully supportive of Design Policies D1 "Making better places", D2 Sustainable design, construction and energy" and D3 "Historic Environment".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17391</th>
<th>Respondent: 15682465 / Nick Beesly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Economic Policies: I am in support of Policy E1 "Sustainable employment" but believe that Policy E2 "Location for new employment floorspace" fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 "Surrey Research Park", Policy E5 "Rural Economy" and Policy E6 "The leisure and visitor experience" but caution that Policy E7 "Guildford Town Centre" could lead to overdevelopment of the Town Centre. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17392</th>
<th>Respondent: 15682465 / Nick Beesly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Economic Policies: I am in support of Policy E1 "Sustainable employment" but believe that Policy E2 "Location for new employment floorspace" fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 "Surrey Research Park", Policy E5 "Rural Economy" and Policy E6 "The leisure and visitor experience" but caution that Policy E7 "Guildford Town Centre" could lead to overdevelopment of the Town Centre. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |
**Comment ID:** PSLPP16/17393  **Respondent:** 15682465 / Nick Beesly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Economic Policies: I am in support of Policy E1 "Sustainable employment” but believe that Policy E2 "Location for new employment floorspace” fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 “Surrey Research Park”, Policy E5 "Rural Economy” and Policy E6 "The leisure and visitor experience” but caution that Policy E7 "Guildford Town Centre” could lead to overdevelopment of the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/17394  **Respondent:** 15682465 / Nick Beesly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Economic Policies: I am in support of Policy E1 "Sustainable employment” but believe that Policy E2 "Location for new employment floorspace” fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 “Surrey Research Park”, Policy E5 "Rural Economy” and Policy E6 "The leisure and visitor experience” but caution that Policy E7 "Guildford Town Centre” could lead to overdevelopment of the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPP16/17395  **Respondent:** 15682465 / Nick Beesly  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Economic Policies: I am in support of Policy E1 "Sustainable employment" but believe that Policy E2 "Location for new employment floorspace" fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 "Surrey Research Park", Policy E5 "Rural Economy" and Policy E6 "The leisure and visitor experience" but caution that Policy E7 "Guildford Town Centre" could lead to overdevelopment of the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Economic Policies: I am in support of Policy E1 "Sustainable employment" but believe that Policy E2 "Location for new employment floorspace" fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy. I am supportive of Policy E4 "Surrey Research Park", Policy E5 "Rural Economy" and Policy E6 "The leisure and visitor experience" but caution that Policy E7 "Guildford Town Centre" could lead to overdevelopment of the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Housing Policies: Policy H1 "Homes for all" suffers from the inclusion of an unacceptable requirement to impose on the University (regardless of Blackwell Farm) an obligation to provide accommodation for 60% of its students on campus. This imposition will limit education and will create a "them and us" style society. The housing problem in Guildford is not caused by students or the University and the Town should not discriminate against them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17388  Respondent: 15682465 / Nick Beesly  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 "Affordable Homes" imposes a high obligation on developers for affordable housing but makes no reference to viability. If we are unrealistic about expectations of what developers must provide it will limit the supply of new homes and increase the cost of those that are built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17399  Respondent: 15682465 / Nick Beesly  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure Policies: The infrastructure policies are sensible. Policy 13 "Sustainable transport for new developments" and Policy 14 "Green and blue infrastructure" are important and I support each of them. Blackwell distinguishes itself in each of these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17400  Respondent: 15682465 / Nick Beesly  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Infrastructure Policies: The infrastructure policies are sensible. Policy 13 "Sustainable transport for new developments" and Policy 14 "Green and blue infrastructure" are important and I support each of them. Blackwell distinguishes itself in each of these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17389</th>
<th>Respondent: 15682465 / Nick Beesly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Protecting Policies: The Protecting Policies Pl "AONB", P2 "Green Belt" and P3 "Countryside" are supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17390</th>
<th>Respondent: 15682465 / Nick Beesly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Protecting Policies: The Protecting Policies Pl "AONB", P2 "Green Belt" and P3 "Countryside" are supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17385</th>
<th>Respondent: 15682465 / Nick Beesly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Strategic Policies: The strategic policies within the plan are sensible. Development must be sustainable and respect natural assets; it must also include some careful use of greenbelt land for the simple reason that there is not enough developable capacity in brownfield sites. I therefore support both Policy S1 "Sustainability" and Policy S2 "Housing number".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17386    Respondent: 15682465 / Nick Beesly    Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strategic Policies: The strategic policies within the plan are sensible. Development must be sustainable and respect natural assets; it must also include some careful use of greenbelt land for the simple reason that there is not enough developable capacity in brownfield sites. I therefore support both Policy S1 "Sustainability" and Policy S2 "Housing number".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1962    Respondent: 15682465 / Nick Beesly    Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am an employee of The University of Surrey who lives locally and am writing in support of the Local Plan and in support of the University of Surrey's part in that plan.

The University plans are robust, professional and show genuine smart growth; they support sustainable transport, relieve critical infrastructural issues and deliver high levels of employment and affordable housing. Those plans need to be prioritised within the Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4259</th>
<th>Respondent: 15685409 / Marie-France Beglan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Guildford Borough Proposed Submission Local Plan: strategy and sites: June 2016.

I have lived in Walton-on-Thames for nearly 45 years and raised my family here. In that time I have seen too many houses being built, beautiful historic houses demolished and ugly blocks of flats built in their place. The roads are very congested, I cannot leave the house during certain peak hours due to traffic. The proposed changes by Guildford Borough Council are on a very large scale and will damage the look and feel of the area forever but also dramatically worsen the already dire traffic situation, e.g. trying to get in and out of Wisley RHS Gardens or shopping in Guildford.

My daughter and her young family live in West Horsley and these proposals will have a very detrimental effect on their village, it’s look and feel. The extra impact on local services (schools, roads and health services) are not adequately addressed in the Local Plan.

My main objections are:

- Erosion of the Green Belt: GBC has not explained clearly what the “exceptional circumstances” are to needing to remove areas from the Green Belt.
- Density and proposed scale of the developments: not in keeping with current density of housing in the area especially in East & West Horsley.
- Lack of provision for increased infrastructure for new number of houses: health, transport, education, sewerage.
- Wisley Airfield New Town: a very large development of 2000 homes which will have catastrophic consequences on the already heavily used A3. The impact on local villages and services will be immense (eg Ripley, Ockham, Horsleys).
- Gosden Hill Farm: Proposed development of 2000 homes like Wisley Airfield will have dramatic consequences on roads and the amenities of local villages.
- “Affordable Housing”: the term is misleading and the demand for these are not high in the villages affected in the Local Plan. Very ill thought through.

For the reasons I have listed above I object to the Local Plan and hope that it will be rejected to protect the area from irreversible damage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RE: Land at Fonthill, Godalming

I write to make comments on the Guildford Local Plan.

Charterhouse School owns and operates a 100 hectare site just outside Godalming. The School has around 800 pupils, all accommodated on buildings within the Godalming site.

The main school site falls within Waverley Borough Council but the eastern part of the site falls within Guildford Borough. Within part of the school’s ownership (and falling within Guildford Borough) is a property called Fonthill (see attached plan). This is a substantial dwellinghouse that is in need of rebuilding.

As can be seen from the attached aerial photos, there are a number of trees within the site and a wide open expanse of open land to the west. This has been subject to various interventions including earth bunding, dating back to when the site was occupied by travellers.

We have no particular objection to the Guildford Local Plan and note the general strategy for the provision of housing. However, we write to advise you of the availability of the Fonthill site, should the Council need to allocate further land for residential development. The site would be contiguous with the existing residential area of Godalming and therefore within easy reach of the services and facilities within the town. There is currently a publicly accessible sports club with cafe and shop within the School providing community facilities within short walking distance of the site. Any development on the site is capable of being entirely enclosed by the existing, established mature tall trees.

The allocation of this site would be entirely compatible with the Spatial Vision of the emerging Local Plan which states that “The plan also proposes almost 1200 dwellings on non-strategic sites within and around existing villages, some of which are now inset from the Green Belt, and over 750 dwellings as extensions to existing villages. These dwellings will offer a variety of housing choice in villages and help contribute to supporting local services and the important role they play in village life.”

Accordingly, the provision of residential development on a part brownfield site adjoining an existing established town is considered to amount to sustainable development. Should the Council find, in the course of discussions on the emerging Local Plan, that it needs to allocate additional sites for residential development then we would be very grateful if the Fonthill site could be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Representations red line - Land at Fonthill.pdf](#) (829 KB)
[Representations letter- Land at Fonthill Godalming (2).pdf](#) (84 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<Local plan rep map attached>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [The Barn, Effingham- Local Plan Reps.pdf](#) (440 KB)

---


Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Insofar as it relates to 'The Barn, Effingham' site. Please refer to the accompanying separate representation submission report dated July 2016 for details.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [The Barn, Effingham- Local Plan Reps (2).pdf](#) (426 KB)

---


Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Insofar as it relates to 'The Barn, Effingham' site. Please refer to the accompanying separate representation submission report dated July 2016 for details.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [The Barn, Effingham- Local Plan Reps (2).pdf](#) (426 KB)
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> (Yes)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Insofar as it relates to 'The Barn, Effingham' site. Please refer to the accompanying separate representation submission report dated July 2016 for details.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>![The Barn Effingham- Local Plan Reps (2).pdf (426 KB)](The Barn Effingham- Local Plan Reps (2).pdf)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> (Yes)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Insofar as it relates to 'The Barn, Effingham' site. Please refer to the accompanying separate representation submission report dated July 2016 for details.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>![The Barn Effingham- Local Plan Reps (2).pdf (426 KB)](The Barn Effingham- Local Plan Reps (2).pdf)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
This representation does not propose a change to the Local Plan, however the landowner maintains an interest in participating at the examination in recognition of the importance that the policies of the new local plan will have upon the interests of the site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016</td>
<td><strong>Question 7:</strong> Any other comments?</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please refer to the accompanying separate representation submission report dated July 2016 for details

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [The Barn Effingham- Local Plan Reps (2).pdf](#) (426 KB)

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4276</th>
<th>Respondent: 15687201 / Mandy Cox</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016</td>
<td><strong>Appendix C:</strong> Infrastructure Schedule</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4275</th>
<th>Respondent: 15687201 / Mandy Cox</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016</td>
<td><strong>Appendix D:</strong> Evidence base</td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7924  Respondent: 15687201 / Mandy Cox  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is protected from development as Green Belt. There are no exceptional circumstances which allow for it’s removal from the Green Belt (Policy P2). Central Government state clearly that housing need is not an exceptional circumstance.

The Plan states the preference is to use of previously developed land, but GBC have removed a brownfield site at Burnt Common replaced it with Garlick’s Arch.

The site is not appropriate because:

- There is no sustainable transport infrastructure.
- The site is liable to frequent flooding
- The site has Ancient woodland and is a wildlife habitat, but no wildlife report for the site is in the Plan.
- There are no plans to improve local schools, medical or utilities to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7923  Respondent: 15687201 / Mandy Cox  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17475</th>
<th>Respondent: 15687201 / Mandy Cox</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

North facing ramps to the A3 at Burnt Common would be a disaster for local communities, which do need to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. E.g. all traffic from London/M25 to Woking would go through Burnt Common, Send and Old Woking. This is not sustainable as this cannot be improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17477</th>
<th>Respondent: 15687201 / Mandy Cox</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

The Garlick’s Arch (A43) proposal would double the built area in the locality, and would irrevocably damage the character of the Ancient Woodland on the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the employment strategy and impact at Garlick’s Arch (A43) (Policies E2 and E5)

There is no need for new industrial sites at Garlick’s Arch (A43). There is an existing brownfield industrial site at Burnt Common that could easily accommodate the 7,000 sq m proposed. That site was removed from the Plan without any reasoning.

Furthermore the development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been for there decades employing local people and are therefore clearly sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17471  Respondent: 15687201 / Mandy Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17478  Respondent: 15687201 / Mandy Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy I1)

The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17480  Respondent: 15687201 / Mandy Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start considering improving the A3 before 2020. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17476  Respondent: 15687201 / Mandy Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for these villages and sites being removed, as required by the National Planning Policy.

The Plan should develop the existing brownfield site at Burnt Common rather than developing Garlick’s Arch (A43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan as the development proposed is not sustainable (Policy S1)

13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car. The Plan has nothing to improve the infrastructure for Garlick’s Arch.

The development should be in urban areas where there is sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7925  Respondent: 15687329 / Kim Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the inclusion of this site in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.
   With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.
2. This site was introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.
3. This development will add to the disproportionate burden on the north east of the Borough.
4. There is a question as to the suitability of the land for building purposes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17489  Respondent: 15687329 / Kim Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17493  Respondent: 15687329 / Kim Sweeting  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Other infrastructure.

Is there adequate power, drainage and sewage provision for industrial development and is there sufficient school, medical and similar provisions for domestic expansion?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17492  Respondent: 15687329 / Kim Sweeting  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours.

2. Light and sound pollution.

The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society.

It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17495  Respondent: 15687329 / Kim Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. It seems perverse that planning permissions have been refused because of the impact on the individual trees whilst the wholesale destruction of woods seems inevitable if these sites are included.
   
   It seems difficult to reconcile these two extreme positions.

   If included in the plan preservation orders should be placed on appropriate trees as a minimum requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17490  Respondent: 15687329 / Kim Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. These developments place a disproportionate burden on the north east of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1973  Respondent: 15687329 / Kim Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination...
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Sites 43 & 43a were introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17546  Respondent: 15688193 / Sally Tagg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Proposed Submission Local Plan– Regulation 19 Consultation

This letter includes the formal comments to Guildford Borough Council’s Proposed Submission Local Plan from Foxley Tagg Planning Ltd. – a national planning consultancy that specialises in custom and self-build.

This response document will explore the proposed submission document’s consideration of custom and self-build matters.

This representation will consider the Proposed Submission Local Plan in the context of the Tests of Soundness, against which the plan will be considered at examination. These tests are:

1. **Positively Prepared**: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

2. **Justified**: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

1. **Effective**: deliverable over its period based on effective joint working on cross-boundary strategic priorities

2. **Consistent with national policy**: enabling the delivery of sustainable development

**Policy Requirements**

Paragraph 50 of the National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state (underlining is our emphasis):

“Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)”
In addition to the above, paragraph 159 of the NPPF considers the requirement for LPA’s to have a clear understanding of housing needs in their area. They should therefore ensure that their policy documents:

“Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)”

Brandon Lewis MP, in his role as Minister of State for Housing and Planning made the following comments in a letter sent to all Local Planning Authorities in March 2015:

“We all need to do more to address the lack of suitable plots of land being made available, and we believe that local planning authorities have a vital role to play.”

The letter went on to say:

“National planning policy and guidance is clear that local planning authorities should identify and plan for local demand for custom and self build housing. Planning inspectors will want to see evidence that consideration of demand for custom and self-build housing has been taken into account when they examine Local Plans. Failure to provide sufficient evidence may lead to plans being found unsound.”

This communiqué from the Department of Communities and Local Government could not be any more explicit in its requirements for LPAs to plan for the needs of those that wish to build their own home.

The Self-build and Custom Housebuilding Bill received Royal Assent on 26 March. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. It is understood that Guildford Borough Council have complied with the legislation and keep a register of those in the borough that wish to build their own home.

The above comments from the Planning Minister and the emerging Right to Build legislation clearly demonstrate how the government intended LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination.

Critique of Evidence Base

The evidence for housing needs within the emerging Local Plan evidence base is centred on the West Surrey Strategic Housing Market Assessment (SHMA) September 2015.

The paper does make reference to custom and self-build and notes that the Government aspires to make self-build ‘a mainstream housing option’ and makes some attempt to quantify the demands for self-build in West Surrey. The paper states that the 2012 Guildford BC Housing Needs Survey revealed a very low interest in self-build in the borough. However, contact with custom and self-build specialist website Buildstore revealed a much higher indicative demand:

‘Within the postcodes of Guildford, there are 65 people registered their details on the Custom Build register and 216 active members on the Plotsearch register’

The SHMA also reveals that Buildstore register of plots shows a supply as of June 2015 of nine self-build sites within West Surrey with six plots for sale in Guildford borough.

It is considered that the council have not really tried to understand the demand for custom- and self-build in the borough. The SHMA simply concludes that there is ‘modest’ demand in the SHMA area with ‘limited’ supply. As a consequence, it is considered that the plan cannot be said to be positively prepared or justified as there has been no concerted attempt to establish the actual demand for custom or self-build within the borough beyond the data held by a single website. This is clearly at odds with the March 2015 letter from Brandon Lewis MP.
Critique of Pre-Submission Plan

There are no policies within the Proposed Guildford Borough Local Plan that deal directly with custom and/or self-build. The reasoned justification (paragraph 4.2.12) explains that the council have a legal responsibility to keep a register of individuals or interested associations that are seeking a plot of land to construct a self-build or custom build house. It further goes on to explain that Guildford BC will have regard to the information on the register when carrying out planning functions and explains that the council ‘have allocated some self-build plots within the strategic housing development sites’. Lastly it states that the council will keep further demand under review.

Whilst the above all sounds promising and would appear to be broadly in line with the requirements in the NPPF, the Right to Build and government missives, a closer look at the allocations made by GBC reveals that the council have not in fact stipulated a number of self-build plots to be allocated nor have they produced a target for the number of self-build plots that should be built in the borough over the plan period.

There are 5 allocated sites on which some provision for self-build is made. However, as can be seen below all five allocations include ‘some self-build plots’ as ‘opportunities’, with no specified figures attached:

POLICY A22: Land north of Keens Lane, Guildford

Opportunities:

- **Inclusion of some self-build plots** as part of the provision of new homes (C3)

POLICY A25: Gosden Hill Farm, Merrow Lane, Guildford

Allocation:

- Approximately 2000 homes (C3), including some specialist housing and self-build plots

POLICY A26: Blackwell Farm, Hogs Back, Guildford

Allocation:

- Approximately 1800 homes (C3), including some specialist and self-build plots

POLICY A35: Land at former Wisley airfield, Ockham

Allocation:

- Approximately 2000 homes (C3), including some specialist housing and self-build plots

POLICY A46: Land to the south of Normandy and north of Flexford

Allocation:

- Approximately 1,100 homes (C3), including some specialist housing and self-build plots (C3)

The above therefore does not guaranteed that any self-build properties will be provided in the borough over the plan period. Indeed, it would appear peculiar in fact that the council would go to the lengths of mentioning self-build within the strategic allocations but not specify how many self-build units should be built, either on each site or even overall.

It is considered therefore that Guildford Borough Council have not in fact identified and planned for local demand for custom and self-build housing. It is a tokenistic approach, which although a step in the right direction, does not go far enough in our view. The council are simply aware that demand is ‘moderate’ and have suggested that there are ‘opportunities’ for self-build on some of the Local Plan’s allocated sites. This is clearly not sufficient to fulfil the government’s requirement that ‘local planning authorities should identify and plan for local demand for custom and self build housing’. As a consequence, it is considered that the plan cannot be said to be **positivity prepared** as the council
cannot demonstrate that needs of the community are necessarily going to be met, specifically those that wish to build their own home.

Furthermore, the plan cannot be said to be consistent with national policy since the NPPF states that councils ‘should look to plan for a mix of housing based on present and future demographics, market trends and the needs of different groups in the community including ... people who wish to build their own homes’. Whilst the Local Plan mentions self-build opportunities in relation to the strategic allocations, there is no guarantee that the numbers that will be delivered will be sufficient to meet the demand in the area.

It is considered that the best way of ensuring delivery of self-build opportunities in the borough is not by alluding to an unspecified potential number of self-build opportunities on an allocated strategic housing site. Rather the council should consider the opportunity for more than one approach which should include the allocation of dedicated self-build sites, giving choice and an opportunity for smaller land owners to come forward with sites. Large developers are considered likely to resist the provision of self-build plots on the strategic allocations preferring to build their own product. Furthermore, since the Local Plan does not state a minimum number of self-build plots that should be provided it is difficult to see how the council will ensure that sufficient are provided. As a consequence, it is considered likely that the provision of self-build opportunities will be unlikely to meet the demand in the borough.

Conclusions

1. The council’s attempts to assess the demand for self-build are inadequate. The plan has therefore failed the test of soundness in terms of being justified and consistent with national policy.

Custom- and self-build demand within the borough must be properly assessed.

1. The ‘opportunities’ for self-build included on the strategic allocations within the plan are wholly inadequate as a means of meeting the demand for self-build in the borough. The plan has therefore failed the test of soundness in terms of being positively prepared and consistent with national policy.

Dedicated self-build housing sites should be allocated within the Local Plan to ensure that the demands of those that wish to build their own home are met.

The Local Plan in its current form clearly cannot be considered sound and the above observations and suggestions are proposed to help to ensure that the plan is robust when submitted for examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Executive Summary

The site is deliverable, located sustainably, has good potential for vehicular and pedestrian connectivity and is enclosed by defensible boundaries formed from existing and consented development ensuring the openness of the Green Belt is not affected.

Accordingly, the site was supported to accommodate significant residential development by the April 2014 Green Belt and Countryside Study and the July 2014 draft Local Plan.

However, the rationale set out within the 2016 Housing Delivery Topic Paper applies a blanket approach which results in the site not being allocated in the draft Local Plan 2016. Such an approach denies the opportunity to consider the value of the site as demonstrated by its exclusion from the 2016 sustainability appraisal despite it being considered an allocated site in the 2014 draft Local Plan. This approach, which does not consider the comparative value of this deliverable site, calls the soundness of the Local Plan into question.

Based on a comparative assessment of the site, its sustainability and deliverability it should be included in the Local Plan as a residential allocation contributing to meeting the housing need of the Borough.

1.0 Introduction

1.1 This document will consider the sites involvement in the Guildford Borough Local Plan process to date, whether the site could be developed, how the site compared to those proposed to be allocated in the Local Plan and whether the site should be allocated for residential development in the Local Plan.

1.2 This document should be read in conjunction with the submitted Site Appraisal and covering letter.

2.0 The site and the local plan process 2013-2016

October 2013 Issues and options

2.1 The site was not included in the 2013 Issues and Options document on the basis that the Council did not consider that the site was deliverable as the owner had not responded to the call for sites. However, Mr Cook, of his own volition entered into dialogue at the time concerned that the Council had not approached him.

April 2014 Green Belt and Countryside Study

2.2 The site was thereafter considered in the Green Belt and Countryside Study of which the relevant part (volume V) identified parcel of land B16A as the application site (plus some surrounding land). The Study, the relevant extract of which is attached at Appendix A, was published in April 2014 prior to the draft Local Plan 2014 being published.

2.3 The Study, which considered whether Send has capacity for a ‘Major Village Expansion’, categorised the wider area the site lies in as a ‘high sensitivity’ Green Belt area. However, it made several observations that the site:

- “is relatively unconstrained in environmental capacity terms”;
- “has a bus service rating of 3 within GBC’s Settlement Hierarchy document which is classed as a good service”; 
- “provides opportunities for pedestrian linkages to the River Wey towpath connecting to Old Woking and vehicular access to the A247 Send Road via Tannery Lane”;
- “provides an opportunity to form a waterfront development”;
- “Send scored highly in terms of total community facilities and was ranked 5th in terms of the sustainability assessments within the GBC settlement hierarchy”;
- “the score of 24 in terms of community facilities is higher than a number of similar sized settlements”;
- “provides opportunities to accommodate a major expansion without significantly compromising the openness of the wider Green Belt across the Borough”; 
- “would not result in settlement coalescence due to the physical separation provided”;
- “would not likely affect any historic setting” and
- “the impact on openness would be limited be enclosure provided by treebelts following the River Wey Navigation to the north, treebelts following Tannery Lane and hedgerows to the east”;

Page 1381 of 2988
2.4 In conclusion the Study “considered that a Potential Major development Area at land parcel B16A (which includes the site) to the north of Send would be appropriate as a major village expansion as the sustainability credentials outweigh the potential harm to the openness and purposes of the Green Belt”.

2.5 It was not therefore surprising that the site was included for residential development in the draft Local Plan 2014.

July 2014 draft Local Plan (Regulation 18)

2.6 The site, as part of a wider parcel of land including Clockbarn Nurseries and land to the south of Tannery Lane, was included for up to 215 residential dwellings in the draft Local Plan 2014 an extract of which is attached at Appendix B.

2.7 In allocating the site the draft Local Plan recognised that “there is an opportunity to provide a mix of uses in this area, resulting in leisure facilities and new homes (including at least 45% affordable homes), close to a strategic employment site (Send business centre). This also makes use of the former nursery that is now disused”.

August 2014 draft Sustainability Appraisal

2.8 The sites allocation for residential development in the 2014 draft Local Plan was further strengthened by the sites high score in the subsequent 2014 draft sustainability appraisal an extract of which is attached at Appendix C.

September 2015 planning approval for the construction of a marina (14/P/02289)

2.9 The sites allocation was again further supported by the approval, in September 2015, of a marina to serve the River Wey Navigation a plan of which is attached at Appendix D. By allowing the application the Council, due to the existing Send Business Centre and Clockbarn Nurseries, enclosed the site changing its character and bringing it within the form of Send.

June 2016 Sustainability Appraisal

2.10 It was surprising, given the Council had previously not only accepted the benefits of, but had actively promoted, the site as a residential allocation, that the site was not considered by the June 2016 sustainability appraisal. This is confirmed by an e-mail from the Council attached at Appendix F.

2.11 This is particularly surprising given that the methodology of the Sustainability Appraisal states (at paragraphs 5.13 and 5.14) that:

“Specifically, in-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then took into account appraisal findings when finalising the Proposed Submission Plan.

More specifically still, this part of the report sets out to present information regarding the consideration of reasonable alternative spatial strategies, i.e. alternative approaches to the allocation of land to meet housing (and economic) needs”.

2.12 Given that the site has previously been considered appropriate for development, and this was confirmed by the draft 2014 Sustainability Appraisal, the fact that the site, as a realistic prospect for accommodation residential development, was not even considered by the 2016 Sustainability Appraisal is surprising and must call into question the soundness of the draft Local Plan.

June 2016 Housing Delivery Topic Paper

2.13 The rationale for applying a blanket restraint on the site is set out in the Housing Delivery Topic Paper 2016 which seeks to focus residential development as follows:

<see attachment>

2.14 This approach disregards the previous assessment of the site that lead to its positive score in the 2014 draft Sustainability Appraisal and its inclusion as an allocation in the 2014 draft Local Plan. Not only does it disregard this
previous work but it prohibits any assessment of the site at all going forward because it is currently sited in the green belt. Such an approach gives no weight to the conclusions of the 2014 Countryside and Green Belt Study (which considered the site favourably) or the change in circumstances at the site (i.e. its enclosure by the approval of the marina, the proposed allocation of Clockbarn Nurseries and existing development) which could arguably lead to the conclusion that site should not be included within the Green Belt designation.

2.15 This approach applies too much weight to the Green Belt designation at too early a stage in the Local Plan process and relies heavily of large allocations being deliverable early within the plan process which, accordingly, calls into question the soundness of the Local Plan.

June 2016 Local Plan (Regulation 19)

2.16 Given the methodology that had been set out in the Housing Delivery Topic Paper it was not possible for the site to be considered for inclusion by the Council in the draft Local Plan 2016. However, development is proposed at Send on Clockbarn nursery and this is set out in the extract from the local plan at Appendix G.

3.0 Should the Green Belt designation be changed?

3.1 The site was included in the Green Belt by the 2003 Guildford Local Plan. However, the context of the site has changed since this time with its increasing integration into Send. To the north the site is bounded by the River Wey Navigation and the consented marina, to the north east by Send Business Centre, to the east by the vehicular access to the consented marina, to the south by Clockbarn nursery and to west by residential development adjoining Send Road.

3.2 It is therefore appropriate to consider whether the Green Belt designation should still apply to the site by assessing it against the five tests set out at paragraph 80 of the NPPF:

<table>
<thead>
<tr>
<th>NPPF Test</th>
<th>The Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>“to check the unrestricted sprawl of large built-up areas”</td>
<td>The proposed site would infill between existing and consented development having little impact upon the openness of the Green Belt.</td>
</tr>
<tr>
<td>“to prevent neighbouring towns merging into one another”</td>
<td>Development of the site would not lead to the actual, nor perceived, merging of two settlements.</td>
</tr>
<tr>
<td>“to assist in safeguarding the countryside from encroachment”</td>
<td>The presence of Send Business Centre, Clockbarn Nurseries and the consented marina has introduced development around the site. The development of the site would not extend the built form of Send into the countryside as it has already occurred at this location.</td>
</tr>
<tr>
<td>“to preserve the setting and special character of historic towns”</td>
<td>The development of the site would not harm the setting or special character of a historic town.</td>
</tr>
<tr>
<td>“to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”</td>
<td>To meet the housing need of the Borough development must occur and it is appropriate to direct it to the least harmful locations with regard to protecting the countryside. Due to the existing and consented development surrounding the site its development would not be considered as encouraging development within the countryside.</td>
</tr>
</tbody>
</table>

3.3 Given the above it can be reasonably considered that the site does not portray the characteristics of a site within the Green Belt as it does not contribute to the openness of the Green Belt due to the presence of existing and consented development enclosing the site.
4.0 Can the site be developed?

4.1 As set out within the supporting Site Appraisal the site could be developed without resulting in any demonstrable harm for a range of dwellings from 50 to 140 dwellings in addition to the provision of open space for the local community. This section will consider the reasons why the site is suitable and deliverable within the earliest stages of the draft Local Plans housing delivery trajectory.

4.2 The site is immediately deliverable as the land is within the control of Mr Cook and there are no known legal or ownership issues that would constrain the site coming forward for immediate development.

4.3 The site is located in a sustainable location when regard is had to the economic, social and environmental dimensions.

4.4 The site would not harm the openness of the Green Belt as it has defensible boundaries encompassed by existing and consented development.

4.5 The site is not located within a designated sensitive landscape and does not fall within any other ‘sensitive area’ as defined in Regulation 2 of the Environmental Impact Assessment Regulations 2011.

4.6 The site can accommodate a high quality of design that respects local distinctiveness in accordance with policy D1 of the draft Local Plan 2016 and includes affordable homes in accordance with policy H2 of the draft Local Plan 2016.

4.7 The site has good existing vehicular access due to the recent formation of an access to the marina and also has the potential to create a further access onto Tannery Land and offer vehicular permeability to the site allocated to the immediate south at Clockbarn Nurseries.

4.8 The amenity of occupiers of the existing residential dwellings to the western boundary of the site can be respected through careful design and layout.

4.9 The site is located close to local services and facilities and can support safe and easily accessible pedestrian permeability to these facilities and services.

4.10 The site can provide open space for the benefit of the local community. Open space would be provided in each phase of development option one as follows: phase one 0.65ha; phase two 0.33ha; and phase three 0.72ha. If development option two is chosen the same would apply but a further 1.55ha of open space would be provided in lieu of phase three. This could include the potential expansion of the marina.

4.11 The introduction of residential development would respect the River Wey Corridor the policy designation for which is arbitrarily drawn. The proposed development would enhance the purposes of establishing the River Wey Corridor by providing opportunities to improve education by increasing understanding of the River Wey Navigation and its associated habitats in accordance with policy E6 of the draft Local Plan 2016. Therefore, the introduction of residential development would enhance the River Wey Corridor Conservation Area in accordance with policy D3 of the draft Local Plan 2016.

4.12 The site would support economic development in Send supporting existing employment sites such as at Send Business Centre. This is in accordance with policy E5 of the draft Local Plan 2016.

4.13 The site is not of any significant agricultural value as it primarily constitutes infill from the excavation of the adjacent (now full) landfill site that was previously formed of gravel.

4.14 Because of the history of the infilling of the surface of the site all the material imported was certified as clear so the site has no known land contamination.

4.15 Whilst the northern part of the site it identified as a mineral safeguarding zone no evidence has been put forward by Surrey County Council to state why this particular parcel of land has an overriding value in that regard.

4.16 The site can be connected to existing gas, electricity, telecommunication, foul sewerage and water services.
4.17 The site is within EA Flood Zone one where the introduction of residential development is considered acceptable. A Sustainable Urban Drainage Scheme (SUDS) would complement a landscaping strategy.

4.18 The site is not within an Air Quality Management Area (AQMA).

4.19 The ecological value of the site is primarily within the existing hedgerows and mature trees along the field boundaries and River Wey Navigation corridor on the northern part of the site. These habitats would be enhanced by the introduction of residential development.

5.0 Comparison with sites proposed to be allocated in the 2016 draft Local Plan

5.1 The methodology employed through the adoption of the Housing Delivery Topic Paper results in a situation whereby many smaller extensions to the Green Belt to accommodate sustainable, deliverable and often appropriate development cannot be considered.

5.2 The methodology also results in significant allocations to large sites being relied upon heavily to meet the housing needs of the Borough – such as almost 4,000 dwellings through extensions to Guildford and 2,000 dwellings at the former Wisley airfield. This places significant pressure on these larger sites, often funded by international finance, to meet the housing need rather than spreading the allocations in a more robust and measured way which reflects the financing structure of smaller sites that often renders them more deliverable as they are robust from international economic pressures.

5.3 The methodology also places significant weight on the Green Belt designation whereas often a development outside of, but adjacent to, the Green Belt may have more of an impact on it than an infill development such as that this representation advocates. This is clearly the case here in that the assessment of the proposed development on the purposes of the Green Belt results in the conclusion that there is little impact on the openness of the Green Belt due to the surrounding existing and consented development. However, as an example, the proposed allocation at Burntcommon (sites A43 and A43A) are located next to the A3 within the Green Belt and have a much greater impact that would be appreciated by far greater people than the site north of Tannery Land.

5.4 A further example is presented by the limited agricultural value of the site as a result of it being formed from extracted material from the adjacent former landfill to the South of Tannery Lane. This is in stark contrast to the high agricultural value of other allocated sites.

5.5 It is this level of assessment that the blanket methodology has restricted and, in doing so, the soundness of the emerging Local Plan must be called into question.

6.0 Should the site be allocated for residential development in the local plan?

6.1 It has been demonstrated that the site is deliverable, located sustainably, has good potential for vehicular and pedestrian connectivity and is enclosed by defensible boundaries ensuring the purpose of the Green Belt is not affected.

6.2 It has been further demonstrated that the previous designation of the land as within the Green Belt should be reconsidered in light of existing and consented development that encompasses the site and reduces its openness.

6.3 However, the rationale set out within the 2016 Housing Delivery Topic Paper applies a blanket approach which results in the site not being allocated in the draft Local Plan 2016. Such an approach denies the opportunity to consider the comparative value of this deliverable site and calls the soundness of the Local Plan into question.

6.4 Based on a comparative assessment of the site, its sustainability and deliverability it should be included in the Local Plan as a residential allocation contributing to meeting the housing need of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1.1 Executive Summary

The site is deliverable, located sustainably, has good potential for vehicular and pedestrian connectivity and is enclosed by defensible boundaries formed from existing and consented development ensuring the openness of the Green Belt is not affected.

Based on a comparative assessment of the site, its sustainability and deliverability it should be included in the Local Plan as a residential allocation contributing to meeting the housing need of the borough.

1.2 Purpose of this document

This document provides a site appraisal and indicative layout to illustrate the development potential of land adjacent to the village of Send, to support a representation to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites consultation June 2016. This appraisal should be read in conjunction with the Policy Appraisal and covering letter which, along with two indicative plans, form the representation to the Regulation 19 Local Plan consultation.

1.3 Site Location

The site currently consists of approximately 4.6 hectares of low value agricultural land. Planning permission has been secured for a Marina to enhance the facilities of the River Wey Navigation to the north of the site. The River Wey Navigation defines the northern boundary of the site, whilst the rear of houses along Wharf Lane and Send Road abut the site’s western boundary. Tannery Lane runs along much of the site’s eastern boundary, providing access into the site (potentially from the existing marina access).

The former Clockbarn Nurseries lies along the southern side of the site, and has been allocated for development in the draft Local Plan 2016 (Policy A42). The development of the adjoining site (subject to this representation) will deliver housing in this sustainable location, while integrating with the development of the Nurseries land to form a natural extension of the village, with the River Wey Navigation marina and Send Business Centre naturally defining the limits of the development.

2.1 Site Context

The Send Parish Plan 2007 provides a useful overview of the village. Send is described as a thriving Surrey village of 1600 households. The village has a long history, and is mentioned in the Domesday Book. It has grown from a small settlement around the New Inn and the adjacent river crossing, with pre-war housing built along Send Road. Further areas of linear
housing along Potters Lane and Send Road and housing areas around Send Marsh and Burnt Common were built in the post-war period.

Send benefits from a range of local facilities including:

- Shops, local services, pub and cafés/ restaurants, mostly concentrated in the local centre;
- Post office;
- Employment provision including at Send Business Centre and Vision Engineering;
- Recreational facilities including recently improved play and exercise facilities at the Recreation Ground, as well as the public rights of way network which gives access to the local countryside and Wey Navigation;
- Send Church of England First School and St Bede’s Church of England Junior School;
- The Villages’ Medical Centre and chemist; and
- Community facilities and places of worship including St Mary’s Church, Send Methodist Church, Send Village Club and Lancaster Hall.

The majority of these facilities are located within easy walking distance of the site.

2.2 Local Character
A study has been undertaken of the character of Send with the aim of identifying the key features of the settlement. This analysis has been used to guide the design of the proposed development.

The density of residential development within the village varies, with densities often being below 25 dwellings to the hectare. However, a recent development at Sandfields was developed at a density of 31 dwellings per hectare, and the Walnut Tree Place development is slightly higher at 36 dph.

Building heights are predominantly two-storey, with some buildings providing further accommodation within roof spaces. There are also a number of single storey bungalows.

Various layouts are evident in the village, with linear traditional development lining the key routes. More recent infill and extensions include cul-de-sac developments and development around small open spaces. Dwellings are detached, semidetached or arranged in short terraces, fronting onto roads.

There is also a range of parking provision with many plots providing parking in front of dwellings, although parking is also provided to the side of plots, within garages and on street.

Send has a range of architectural styles, reflecting the different ages of its buildings. Key features include:

- Hanging tiles;
- Brick and render external walls;
- Plain brown or red clay tiles, interlocking tiles and grey slate;
- Hipped, half hipped or gabled ended pitched roofs;
- White sash and casement windows;
- Dormer windows; and
- Brick porches and chimneys.

2.3 Landscape Features
The site benefits from the current key green and blue infrastructure:

- The River Wey Navigation – the Navigation runs along the site’s northern boundary facilitating the approved marina; and
- Trees and hedgerows – the site’s field margins are lined by trees and hedgerows. The development of the site would retain the vast majority of these green assets, using retained and enhanced field boundaries to provide the basis of the landscape framework for the development.

The largely agricultural nature of site means that development is not expected to have significant adverse ecological effects. Indeed, a the introduction of residential development has the potential to deliver ecological enhancements through the provision of new aquatic and terrestrial wildlife habitats.
A scheme can be developed for the site which ensures that there are no unacceptable impacts on the ecology of the wider area, including designated sites such as the Papercourt Marches SSSI to the east.

2.4 Connectivity and Access

As set out above, the site benefits from being in close proximity to a range of local facilities, and thus provides opportunities for journeys to be made on foot or by bicycle. Pedestrian and cycle facilities around the site are currently poor with a lack of footway on most of Tannery Lane and no cycle lanes or off street routes in the close vicinity of the site. The development of the site provides the opportunity to contribute to the improvement of facilities for these transport modes for the benefit of the local community.

A number of public rights of way run close to site boundaries, providing an existing network into which the development can connect. There is the opportunity to enhance the network with additional links.

Vehicular access to the site is provided by Tannery Lane, and the development of the site can contribute to any necessary works to improve the junction of Tannery Lane, Send Road and Sandy Lane. Tannery Lane is currently used by HGVs accessing the Send Business Centre, and the development could contribute to measures to improve the road alignment to enable vehicles to pass more easily.

The nearest bus stops are located on Send Road within 150 metres of the site. Arriva 462 and 463 bus routes serve these stops, combining to provide an hourly service between Guildford and Woking through Send.

2.5 Flood Risk

Although the low lying surrounding context of the site is dominated by water, the site itself lies within Flood Zone 1, the least vulnerable designation that is therefore the most suitable for residential development. The residential development of the site would include proposals to sustainably address surface water issues, ensuring that the development at least maintains current volumes and quality of surface water run off.

2.6 Landscape Character and Views

The key landscape features of the site consist of the blue and green infrastructure set out above. The residential development of the site would retain and enhance these features as far as possible. The visual effects of the scheme on the Wey and Godalming Navigations Conservation Area would be a key consideration, with appropriate setting back of buildings and landscaping to minimise visual effects and ensure that the development preserves and enhances the Conversation Area.

The relatively flat nature of the site and its context, and the existing trees and hedgerows result in a site that is visually self contained. Careful consideration would need to given to immediate views into the site, particularly from adjacent residential development. The treatment of boundaries and inclusion of landscape buffers would be important in providing visual screening.

2.7 Site Opportunities and Constraints

The above analysis has highlighted a number of key opportunities and constraints which provide the framework for the residential development of the site. These are:

- The site provides the opportunity to deliver a mix of new homes, including affordable homes for local people, in a sustainable location close to local facilities;
- The River Wey Navigation is a key site feature and provides the opportunity to create a high quality waterside environment. The need to protect or improve the special character of the Navigation is also a constraint;
- Tannery Lane can provide accesses to the site at a range of locations, and the scheme provides the opportunity to improve the alignment of the lane;
- The development of the site can contribute to improvements to the junction of Tannery Lane, Sandy Lane and Send Road to ensure that additional vehicular traffic can be suitably accommodated within the road network;
- The scheme will need to carefully consider the relationship with adjacent existing development;
• The existing pedestrian network (including public rights of way) must be retained, and forms the basis for the creation of new linkages. There is an opportunity to improve the currently poor cycle and pedestrian provision in the vicinity of the site, including improved footway provision on Tannery Lane. Send Road currently acts as a barrier to pedestrian movement, and there is the opportunity to provide crossings at the junction with Tannery Lane;

• Development of the site must ensure that there is no adverse impact on nearby designated sites, including the Site of Nature Conservation Importance and Sites of Special Scientific Interest. There is the opportunity to enhance the site’s ecological value; and

• Existing trees and hedgerows that contribute to the character of the site should be retained and guide the layout of the scheme. These provide the starting point for the development of a high quality landscape framework for the site.

3.1 Residential Site Allocation

Indicative plans setting out how residential development could be accommodated on the site have been developed to illustrate how it could deliver an attractive extension to the village. The scheme has the potential to deliver up to 140 units (development option 1) and can be developed in phases, or in part.

The Concept Plan opposite (page 17) shows indicatively how the units could be laid out on the site.

Development option 2 (shown overleaf (page 18)) shows an approach that could accommodate 90 dwellings but retains a large area of open space adjacent to the Wey Navigation for the purposes of further respecting the setting of the River Wey Navigation, providing valuable amenity space for the local community and enabling additional ecological enhancement.

3.2 Delivering New Homes

The extension to the village can be well-integrated with the existing and proposed adjacent built form. The figures provided indicate a density of approximately 30 dwellings per hectare, reflecting a balance between the objectives of making the best use of the land while at the same time respecting the local character of Send.

Building heights would be predominantly two storey, with some dwellings having accommodation in the roof. The scheme could accommodate a mixture of unit types, sizes, styles and tenures, and will include affordable housing for local people. The marina and Wey River Navigation provide the opportunity to develop waterside units, the design of which can draw on marine themes. Architectural detailing and materials can make reference to the local vernacular as evident in the character of the local area (see Section 2). Thus elements such as brick and render external walls, plain clay tiles and slate for roofs, hanging tiles, decorative brickwork, brick porches and chimneys, and white sash and casement windows would be likely to feature within the scheme.

3.3 Access and Movement

Vehicular access could be provided from Tannery Lane to serve the development both from a new access point to the south of the approved marina access (or in combination with the marina access), and through the adjacent Clockbarn Nurseries development.

As set out in Section 2, the scheme can contribute to improvements to the alignment and width of Tannery Lane, as well as to the junction of Tannery Lane, Sandy Lane and Send Road. These improvements would address any issues created by additional traffic created by the development, and would also improve local pedestrian infrastructure by providing safe crossing facilities for Send Road. New pedestrian links can be provided to connect with the existing pedestrian network, and there may be potential for the scheme to contribute to the delivery of a new footway along Tannery Lane close to the village centre.

3.4 Landscape Strategy and Open Space

The proposed residential development would be delivered with a high quality landscape strategy including the following key elements:
• Existing trees and hedgerows of value to be retained and enhanced, and forming an important input into the layout of the scheme;
• A significant landscape buffer zone to be provided along the Wey Navigation;
• Further landscape buffer zones and planting to be provided between the proposed development and neighbouring residential areas;
• Linear open spaces and gardens to provide visual and green links through the development;
• The adjacent marina and associated landscaping would form a key landscape feature to which the residential development can respect; and
• A series of open spaces would be incorporated into the scheme, connected by green links through the development. Providing green links to the waterside would be a key feature of the strategy.

3.5 Local Facilities

In addition to bringing forward new homes including affordable housing, the site’s developers would enter into a legal agreement (or make payments under the emerging Community Infrastructure Levy) to provide significant financial contributions towards local infrastructure and services. A site specific legal agreement may also be required to contribute to the upgrading of the access to the site. The exact nature and amount of these contributions will be defined as the proposals progress, but it is envisaged they will relate to issues such as healthcare, children’s services, education, sports and leisure provision.

3.6 Sustainability

The proposals have the potential to deliver a sustainable development in its broadest sense. Key aspects of the sustainability of the scheme could include:

• Scheme layout to maximise solar gain and natural lighting through the orientation of the majority of the dwellings to the south, east and west;
• Sustainable energy including energy efficiency measures and possible generation of power from decentralised, renewable or low carbon energy sources;
• Amenity space and access to the waterside;
• A safe and secure design underpinned by Secured by Design principles;
• Transport design to encourage walking and cycling for local trips;
• Protection and enhancement of the site’s ecological value;
• Use of sustainable and locally sourced materials wherever possible;
• An integrated approach to water demand and rainwater disposal using sustainable urban drainage systems as far as possible; and
• A waste management strategy to promote resource efficiency in construction and encourage recycling in operation.

3.7 Place-Making

Character
• Traditional Surrey vernacular integrated into the village.
• Brickwork and render, hanging tiles, plain tile and slate roofs.
• Gabled, half hipped and hipped roofs.
• Decorative brickwork and traditional chimneys and porches.
• White framed windows and doors, bay windows.
• Contemporary waterside development.
• Waterside housing drawing on marine theme with potential for timber boarding and balconies. Street Scene
• Homes to provide frontages to activate streets.
• Hedges, timber fences, open meadow areas, gravel paths.
• Detached, semi-detached and short runs of terraced housing.
• Shared surfaces on lanes.

Landscaping and Open Space
• Retain the existing trees as far as possible.
• A landscape buffer zone along the Wey Navigation.
• Open spaces and gardens providing green links through the development.
• Play space for children.

Working with the Village
• Easy walking and cycling to the village centre and facilities.
• Pedestrian crossing facilities on Send Road.
• Financial contributions to local facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Tannery Lane - Policy Appraisal.pdf (6.7 MB)
- 14068 - C05B (concept).pdf (6.5 MB)
- Tannery Lane - Cover Letter.pdf (319 KB)
- Tannery Lane - Site Appraisal.pdf (3.0 MB)
- 14068 - C04B (concept).pdf (6.9 MB)

Comment ID: pslp171/2414  Respondent: 15688385 / OSP Architecture (David Cranmer)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land North of Tannery Lane, Send – representation to the Guildford Borough Proposed Submission Local Plan (Reg 19): Strategy and Sites 2017 Consultation

We write further to our comments on the proposed submission Local Plan: Strategy and Sites 2016 Consultation on behalf of Mr Geoff Cook, in support of residential development at Land North of Tannery Lane, Send. We previously raised concerns that the Plan was not sound due to the lack of sustainability assessment for this site and we consider this to still be the case. Accordingly, we once again put forward the site for development, given our view of its appropriateness for residential use and the contribution it can make towards meeting the housing need of the Borough.

The consultation submission draft acknowledges the need for ‘at least’ 12,426 new homes by 2034. However, the proposed method for delivering this commitment, once again raises concerns regarding the reliance on strategic sites, which as previously highlighted is not considered to be a robust strategy given the uncertainty over their deliverability and timing of delivery.

The information previously submitted (and re-provided with this submission) sets out that the site could accommodate a range of residential development from 50 to 140 dwellings, depending on the housing need of the Borough, and that the site is both suitable, and better placed than many of those proposed in the draft Local Plan submission, to meet this need. It is also noted that the consultation submission draft now proposes an amendment to omit Send Business Park from the Green Belt, bringing this site’s continued inclusion in the Green Belt into question.

Due to the proposed allocation of residential development on Clockbarn Nursery (for 60 homes), the presence of Send Business Centre (to be removed from the Green Belt) and the granting of permission for a marina (14/P/02289) adjacent to the River Wey Navigation, the development would be enclosed on 3 sides by development that falls outside of the Green Belt. This position reinforces the view that this is an appropriate site for removal from the Green Belt and for residential development, a view the Council strongly endorsed in the first draft of the Local Plan.
As noted above, it is concerning that the methodology of the Housing Topic Paper 2016, along with the sites exclusion from the 2016 Sustainability Appraisal, does not provide the opportunity for the suitability of the site for residential development to be properly assessed. This is despite its inclusion in the draft Local Plan 2014 (and high score in the draft 2014 Sustainability Appraisal). Such a methodology, therefore, calls the soundness of the draft Local Plan 2017 into question.

We consider that proper analysis of the site overcomes the reasons for removing it from the draft Local Plan (since its previous inclusion in 2014), indicated as simply because it is zoned in the Green Belt. It is also noteworthy that the site is previously worked land, being a refilled gravel pit, with a poor 2B+ soil rating, so has no agricultural value.

Having regard to the view that the site no longer accords with the proposed spatial strategy in the local plan, the site is not considered to be any different, in terms of scale, to many of the parcels of land that have been included within the draft. The reliance on moving allocations to alongside the A3 and building large estates would have implications in terms of noise, pollution, and raises concerns that Send village will become a thoroughfare. These issues would not be of concern with the allocation of the Tannery Lane site, particularly given the allocation of the Clockbarn Nursery adjacent.

Accordingly, based on a comparative assessment of the capacity of Send to accommodate development, the sustainability of the site, its deliverability and its contribution/impact to the Green Belt it is considered that the site should be included in the Local Plan as a residential allocation contributing to meeting the housing need of the Borough as it:

• Is in a sustainable location (with regard to the economic, social and environmental dimensions);

• Is immediately deliverable;

• Can provide affordable homes for the local community;

• Can provide homes of a high quality design reflecting local distinctiveness;

• Is not of any significant agricultural value;

• Would not harm the purposes of the Green Belt, being surrounded on 3 sides by development outside of the Green Belt;

• Has defensible boundaries encompassed by existing and proposed development;

• Has good vehicular access and linkages to the local highway network;

• Can support good pedestrian permeability to local services and facilities;

• Can support the provision of open space, including the potential expansion of the marina facilities, for the local community;

• Would complement local economic development; and

• Would support cultural education and understanding linked to the River Wey Navigation.

Given the above we are, therefore, pleased to re-provide the following documents, previously submitted in support of the representation to the 2016 consultation:

• A Policy Appraisal;

• A Site Appraisal;

• An indicative layout for a 90 dwelling development; and

• An indicative layout for a 140 dwelling development.
I trust that the information provided will be adequate to demonstrate why residential development should be allocated to the site in the Local Plan and please feel free to contact me should you require any further information of clarification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 14068 - C05B (concept).pdf (1.7 MB)
- Tannery Lane - Policy Appraisal.pdf (6.7 MB)
- Tannery Lane - Site Appraisal.pdf (2.6 MB)
- 14068 - C04B (concept).pdf (1.7 MB)

I write as a frequent visitor to my family in Compton and a lover of the surrounding area as an escape from the metropolis, and also as one of many enthusiastic supporters of the Watts Gallery.

Compton is a beautiful and historic village that is known and loved by a surprisingly large number of people who have no connections to it and do not live anywhere near it. Its attraction is partly due to the houses that line its narrow thoroughfare, The Street, partly its position close to an Area of Outstanding Natural Beauty and partly the draw of the Watts Museum, St Nicholas’s Church and the Withies pub.

It seems that Guildford is bulldozing The Local Plan through without considering fully enough the overall effect it will have not only on Compton (particularly the Street (A3000) which is already at saturation point and producing higher pollution than is permissible or desirable) but also on the surrounding Green Belt and ANOB areas.

Fiona Curtis has summed up the objections better than I could and I thoroughly endorse all that she has written. I copy her letter below and ask that all of her points should be thoroughly dealt with. Of course we need more housing but it should be firstly on any available brownfield sites and not before the transport and environmental problems have been addressed.

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the plan.

The Employment Land Needs Assessment

I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.
I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

**Infrastructure**

**I object**

The infrastructure schedule makes reference to 'improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these 'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

**The Highway Assessment**

**I OBJECT**

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]
The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have An acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF'. We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions.
during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.

The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA)

I Object

The “objectively assessed need” figure of 693 homes a year is too high.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
• issues with the way it considers students and affordability, and
• flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land Assessment

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed. There is therefore no justification for release of all the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study

I object

GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
ABSENCE OF POLICY ON RIVER WYE

I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

- It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
- The special character of the landscape and townscape in the corridor is protected or improved;
- Views both within and from the corridor which contribute to this special character are protected or improved;
- Where appropriate, public access is provided to and along the River and the Navigations.
- The Nature Conservation value of the site is protected or improved.

GREEN BELT SITES

I object to ALL Green Belt sites allocated for development in the local plan.

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:

- The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
- The South Downs are National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
- More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
- The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.
- Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in “Guildford urban area” and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7965  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A26 Blackwell Farm

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for
building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.

Purpose 1 – “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.

Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.

Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land”

Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land.

Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt.

The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worpswold and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process.

The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue.

GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to
accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic.

The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit.

The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west.

The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

** Images could not be opened **

** What changes (2016)/further amendments (2017) do you suggest should be made to the document? **

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7966</th>
<th>Respondent:</th>
<th>15688481 / Sally Lescher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A55</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to 'enable delivery'. The area warrants Green belt status and should remain in Green Belt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches.

** images could not be opened **

** What changes (2016)/further amendments (2017) do you suggest should be made to the document? **

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17613</th>
<th>Respondent: 15688481 / Sally Lescher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to Policy D1 Making better places</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17614</th>
<th>Respondent: 15688481 / Sally Lescher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to Policy D2 Sustainable design, construction and energy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to policy D3 Historic Environment

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy D4 Development in urban areas and inset villages

This policy that does not address the opportunity for building in the urban area

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).

The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on green-field sites instead.

This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

**THE BROWNFIELD OPPORTUNITY**

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. But first we must make good use of our urban brownfield before we consider building in the Green Belt or countryside.

Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly. “We are committed to a brownfield first initiative whereby all applications on previously developed land are given fast track priority and every facility to promote development for residential purposes and employment purposes in order to satisfy the needs of local people. In parallel a low CIL incentive should be given for all residential development on brownfield land.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief

Perhaps someone could be appointed at GBC with a clear briefing to deliver brownfield targets of housing and employment space

GBC needs to accelerate the residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years

GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact.

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for significantly more homes. See details on GGG website - Guildford Greenbelt Group

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/17603 **Respondent:** 15688481 / Sally Lescher **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to policy E1 sustainable employment

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015.

I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF.

I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8.

The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below).

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is given to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033.

I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/17604  **Respondent:** 15688481 / Sally Lescher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to policy E2 location for new employment floor space

I object to the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt.

The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%)  

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%.

There is currently 14% expansion space already available.

The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio.

The majority of existing buildings are 2 stories giving a developed floor space plot ratio of 12.5%.

The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.

A preferred location for increased B1a and B1b space would be in the Town Centre close to housing and a convenient transport hub.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/17605  **Respondent:** 15688481 / Sally Lescher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
I object to Policy E3 maintaining employment capacity

I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound

Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic

The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)

To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes.

To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17606</th>
<th>Respondent:</th>
<th>15688481 / Sally Lescher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
</tr>
<tr>
<td></td>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td>()</td>
<td>()</td>
</tr>
</tbody>
</table>
I object to policy E4 Surrey research Park.

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I object however to the completely unnecessary expansion of the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University.

I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I object to the inclusion of B1c uses which is inappropriate and unnecessary.

Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user

Research parks that lose their way stop being the location of choice for new innovative enterprises.

I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing

Monitoring indicators should include new start-ups and new patents created
Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments

I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m

Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept

I object to the policy of any new extension of the research park more than the existing 14% already provided for within the park or within the footprint of the park

The Surrey Research Park currently extends to 65,000 sq m

There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker

The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis

The ELNA 2015 calculated annual floor space demand is 0.7%

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.
The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17607  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E5 Rural Economy

In my opinion this policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale and character.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small and the percentage of the population who are able to do voluntary work is smaller still.

The solution is therefore unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17608  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit.

Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17595  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station.

Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17596  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy H2 Affordable homes.

“Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally in enormous debt (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17597  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to policy H3 Rural Exception Homes

This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17619  Respondent: 15688481 / Sally Lescher  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</th>
</tr>
</thead>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to policy I1 Infrastructure and delivery

Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem.

The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly.

This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceeding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable.

The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model.

Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods.
Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan.

The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network.

It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below.

In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5..indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton.

The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”.

Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure.

The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore, there will be a period in which the existing A3 has to cope with the additional demand arising from those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:

Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road / Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey research park and the RSCH through the development (para 4.7.3).

Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8).

Wisley – traffic will increase on minor roads to gain access to the A3 (N and S bound) and other routes (para 4.7.11). The development will add more traffic to the A3. The Burnt Common slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)
Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Land, B3000 junction, but an increasing at the Puttenham Hill/Millbrook junction.

Ash – development in Ash is not specifically addressed, but there are major increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction).

Slyfield – there are no remark relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane.

Town Centre – the report has very little to say about the town centre. It is evident that the model is forecasting severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. No mitigation measures are planned. And in the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined, but traffic using the A281 from Waverley, for example, would be affected.

The B3000 will be severely affected by development schemes and will not benefit from road improvements. It is essential that the impact of all change to road networks are looked at in conjunction with one another for any survey to be meaningful. The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

** Images could not be opened **

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17620</th>
<th>Respondent: 15688481 / Sally Lescher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy i2 Supporting the Department of Transport’s “Road Investment Strategy”

This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest.
Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17621  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I3 Sustainable transport for new developments

This is another aspirational policy, not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust. One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times.
Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. For an adult couple going shopping it is still cheaper to park in town.

I like the idea of water buses but have concerns over the reality. The Wey is narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented. Ie. Cost of housing will increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17623</th>
<th>Respondent: 15688481 / Sally Lescher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to policy I4 green and blue infrastructure.

This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17598</th>
<th>Respondent: 15688481 / Sally Lescher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to policy P1 Surrey Hills Area of Outstanding National Beauty. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they…”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…”

This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.

“In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

“The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

“Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, I would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. This should include Blackwell Farm which was recently reviewed by an Independent consultant and deemed worthy of inclusion as a candidate. I consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement.

The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold.
I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore, I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under 'infrastructure'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17628  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to ALL Green Belt sites allocated for development in the local plan

I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are tired of repeating the same comments as it appears to be a waste of time and effort. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy P3 Countryside (i.e. beyond the Green Belt)

This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.

It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to policy P4 Flood risk and water source protection zones

Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.
I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17602  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to policy P5 Thames Basin Heath Special Protection Areas

This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17589  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---
I object to policy S1 as stated and the presumption in favour of sustainable development.

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given.

The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17594  Respondent: 15688481 / Sally Lescher  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn.

The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high.

I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “ It should be noted that
local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.”

Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement.

However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.

A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum.

The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit.

NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that:

- The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area.
- There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further.
- The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast.
A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA.

The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. The vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. There should be no increase for affordability above basic demographic change.
3. There should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market
4. The use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction.

Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target.

The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards.

It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable.

The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.

Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed.

The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

THE NEED TO APPLY CONSTRAINTS

Ministerial guidance in relation to building on the Green Belt is clear:

1. “The single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.
2. “We were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.
3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.
70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements).

Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500.

In view of the comments above it would appear logical to apply CONTRAINTS in line with government policy to a corrected OAN of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council.

This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure.

It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015)

The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office.

Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/1993  **Respondent:** 15688481 / Sally Lescher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan preparation process has had inadequate regard for national policy, which attaches "great importance" to the "openness" and "permanence" of Green Belt. The test of "exceptional circumstances" that might justify allocating Green Belt land for the development in a Local Plan has not been rigorously and transparently applied at a strategic level.
The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds EU regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

I object

The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with highs of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1994  Respondent: 15688481 / Sally Lescher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have given greater protection to their Green Belt if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN) as no reasonable constraints have been applied. The constraints that could and should be applied
It was recommended by landscape consultant Alison Farmer Associates that the area known as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

**A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.**

*There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?*

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of ‘exceptional’ is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term ‘exceptional’?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as
railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.

Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don't believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.
Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify large developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** SQLP16/1995  **Respondent:** 15688481 / Sally Lescher  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
Cooperation is a two-way street. Guildford objected to Waverley's plans for Dunsfold on the grounds of increased traffic and in the same submission referred to positive consideration of unfulfilled OAN. Guildford also refers to its duty to consider Woking's unfulfilled housing. Guildford does not have land to spare to assist Waverley or Woking without taking vast amounts of land out of Green belt, which is protected by the NPPF. Greed is not 'an exceptional circumstance' and if both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1996  Respondent: 15688481 / Sally Lescher  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Blackwell Farm in the plan and would like to attend the examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1997  Respondent: 15688481 / Sally Lescher  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.
The NPPF is open to interpretation, but it is our belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/2002</th>
<th>Respondent:</th>
<th>15688481 / Sally Lescher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ABSENCE OF POLICY ON RIVER WEA

I object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

- It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;
- The special character of the landscape and townscape in the corridor is protected or improved;
- Views both within and from the corridor which contribute to this special character are protected or improved;
- Where appropriate, public access is provided to and along the River and the Navigations.
- The Nature Conservation value of the site is protected or improved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/4290  **Respondent:** 15689793 / Gladman Developments (Mat Evans)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

**Constraints and Objectively Assessed Need**

Policy S2 sets out the development targets for housing, employment and gypsy and traveller pitches. There are a number of factors to assess in establishing if these targets are robust and correct. The first consideration must be an establishment of whether the Council has made a robust assessment of its full objectively assessed housing need (FOAHN). Once this has been considered factors which may prevent the Council from meeting its FOAHN can be taken into account to arrive at the housing requirement for the district.

The Council commissioned GL Hearn to produce its evidence on housing needs, the work was carried out alongside Waverly and Woking districts to form the West Surrey Housing Market. The report produced in October 2015 concluded that, for Guildford, the FOAHN was 693 dwellings per annum.

Having reviewed the evidence there are a number of issues which Gladman believe require further consideration by the Council. These are:-

1. The base date projections are now out of date following the publication of the 2014 household projections on the 12th July 2016.
2. The market signals uplift applied to Guildford is not sufficient. Affordability in the area is chronic. Inspector’s reports in other Local Authority areas such as Canterbury, an area with less housing market pressure than Guildford, have endorsed at least a 20% uplift. The figure for Guildford quoted by GL Hearn is just 31 dwellings per annum.
3. The allowance for economic growth seems weak when considering the strength of the local economy.
The Council is in need of a refresh and update of the work in order to properly inform policy S2. However as we have outlined establishing FOAHN is only the first part of the process, and just because the FOAHN may increase it does not automatically follow that the housing requirement for the district should also increase, or increase by the full amount. Guildford is a highly constrained authority with much of its area washed over by Green Belt, however it is important to assess the full housing need figure in order that the Council can be clear as to what it can meet, what it can’t meet and what discussions it needs to have with neighbouring authorities about delivering its unmet housing need.

As drafted at present the policy states it will be delivering 13,860 homes between 2013-2033. A stepped trajectory included in the policy explains that the annual housing target from 2018-2033 is 10,395, the Councils Table 1 shows a surplus of housing sites to build flexibility in meeting this target. Therefore whilst Gladman question the robustness of the SHMA and note it is in need of updating to fully establish the FOAHN for Guildford, Gladman are supportive of the approach taken by the Council in meeting housing needs within the area. The overall figure, we believe, may be an underestimation but the Council is proactively trying to meet it despite the constraints of the district.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4291  Respondent: 15689793 / Gladman Developments (Mat Evans)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Conclusion

At present therefore, Gladman are concerned that the establishment of FOAHN is not robust and therefore the housing requirement within the plan is based on evidence which is not justified or up to date. We would however wish to endorse the Councils approach to seeking to deliver housing in an area of heavy green belt constraint. The Councils approach in proactively and robustly assessing its green belts to help deliver much needed housing and economic growth is to be supported, therefore whilst we believe the FOAHN is higher than that established by GL Hearn it does not mean that the Council have not prepared an otherwise sound plan. As we explain above even with a higher FOAHN the housing requirement for Guildford may well be appropriate.

We trust that these representations are helpful, we would request the right to be heard at the reconvened examinations to discuss the above points in further detail and to elaborate on the points expressed in this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17612  Respondent: 15689793 / Gladman Developments (Mat Evans)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

---

Page 1434 of 2988
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gladman acknowledge the importance of the historic environment and the important role the Council has in ensuring its continued protection and enhancement. However, we believe that the policy as written at present is at odds with NPPF paragraph 134. Whilst it is clearly acknowledged what the NPPF states in paragraphs 132 and 133 about the substantial harm or total loss of a heritage asset policy D3 does not recognise the wording in NPPF paragraph 134. That talks about weighing the harm done to the heritage asset against the public benefits, the wording currently within D3, in our view goes a step beyond this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17610  Respondent: 15689793 / Gladman Developments (Mat Evans)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst the concept of what the policy is trying to achieve is acknowledged, Gladman have concern that the policy could be used to refuse development, when the development in question represented sustainable development. We would suggest that the policy should be rewritten to incorporate a reference as to how the policy will be used as part of a wider judgement on the sustainability of a site.

Given the nature of the district it is entirely possible that none green belt land may come under more pressure than other areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17609  Respondent: 15689793 / Gladman Developments (Mat Evans)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Whilst Gladman are in full agreement with the statement for the presumption in favour of sustainable development, we are concerned that the way the statement is expressed in policy S1 is simply a watering down of the policy as contained within paragraph 14 of the NPPF. We are unconvinced that a separate statement, beyond the NPPF is required, however if the Council wish to include the policy it should be as per the wording of the NPPF. At present therefore we do not consider the policy sound by virtue of it not being justified or consistent with the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1999</th>
<th>Respondent: 15689793 / Gladman Developments (Mat Evans)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Introduction

Gladman Developments Ltd (Gladman) specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, Gladman understand the need for the planning system to deliver the housing and economic needs of an area, whilst responding positively to the wider opportunities for growth.

This submission provides Gladman Developments’ written representations to the submission version of the Guildford Local Plan (strategy and sites). The plan will be followed by a part 2 plan considering issues relating to development management policies.

The plan is at submission stage and therefore has already been subject to public consultation. This submission draft of the plan is one that the Council should consider ‘sound’, which means it should be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Gladman have considered the documentation and accompanying sustainability appraisal prepared by the Council, which support the submission version of the Guildford Local Plan. This representation outlines some brief comments from Gladman with regard the Councils approach to its constraints and its establishment of its FOAHN, and the implications this may have for neighbouring authorities, the housing market area and discussions being undertaken through the Duty to Cooperate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2000</th>
<th>Respondent: 15689793 / Gladman Developments (Mat Evans)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Duty to Cooperate and Unmet Housing Need

Our main concern, therefore, is if the Councils FOAHN is an underestimation, and if there are reasons why it cannot meet a higher FOAHN what implications does this have for the HMA and surrounding districts. We have been able to find no record of the discussions which may or may not have taken place under the Duty to Cooperate, and we would expect to do so. Nevertheless the point is it is vital for Guildford to fully understand its FOAHN, set out what it can meet and identify where any unmet need is being accommodate through conversations using the Duty to Cooperate.

If there is found to be a shortfall we would wish to bring to the Councils attention the case of Warwick District and the Coventry HMA. The examination of the Warwick EIP has been in effect paused since May 2015 because of the level of unmet need within the HMA1. The inspector into the Warwick Local Plan was so concerned by the failure of the local authorities to reconcile the issue of unmet housing need that at one point he was proposing the plan should be withdrawn as he considered it unsound. Since this time that HMA has made significant strides on joint working with regard housing numbers, SHLAA assessment and green belt release. The HMA contains significant levels of green belt.

Local Plan Expert Group (LPEG)

The government remains concerned that the Local Plan process remains flawed, overly long and is leading to plans and HMAs which are failing to adequately plan for their housing needs. The lateness of which is particularly prevalent in the south east. As a response LPEG was commissioned to look at ways in which the Local Plan system could be improved. The report was published in March 20162 and was the subject of a consultation which ran until 27th April 2016.

LPEG are quiet clear in their recommendation that the Duty to Cooperate has failed to deal with the unmet housing needs emanating from certain areas of the country. LPEG do not underestimate the difficulties faced by local authorities in planning to meet housing need however they recommend a series of changes, in Appendix A - section 5 to the main report, to ensure that HMAs cannot simply pass the buck on housing needs. These include:-

- Establishing coordinated HMA boundaries;
- Strengthening the Duty to Cooperate and including and adding the following wording to the tests of soundness in para 182 of the NPPF;
- the product of joint working between authorities is expected to be agreement on the distribution of full OAN unless there is clear and convincing agreed evidence that the adverse effects of meeting the need in full would significantly outweigh the presumption that the need should be met;
- plan making authorities who do not plan to meet their own OAN are expected to identify in their submitted plans how those needs are likely to be met and to proactively work towards achieving the meeting of those needs – this should involve, for instance,
- testing the assertions of adjacent authorities who claim an inability to meet those unmet needs and challenging that assertion if capacity is considered to be available to meet needs;
- formally requesting that adjacent authorities meet those needs; and
- making representations to adjacent authorities’ plans to meet those needs in the event that agreement has not been reached.
- where unmet needs are identified as a result of this process, planning authorities requested to meet needs from adjacent authorities whether within the same HMA (or not) will be expected to treat that unmet need as part of their own OAN and to apply the same NPPF tests as they do to their own OAN in assessing their ability to meet those needs within their local plan

It is acknowledged that the LPEG recommendations have not yet been formally accepted by government, however it is clear that the problems of unmet need in and bordering HMAs is a significant problem for many local plans at present. We have put forward the example of Warwick where an Inspector has properly sought to grapple with these
significant issues, we believe strongly that a similar approach must be taken in Guildford and the surrounding districts. Too many plans have already been passed without any significant work undertaken to address the levels of unmet need being generated and where the housing need is to be accommodated, the problem is only likely to grow, and starting to tackle it now is the only sound approach to take in preparing a sound, future proof Local Plan. LPEG clearly state how they thing this can be undertaken, and it is likely that the full impacts of what LPEG proposes will start to be felt imminently. The Council should therefore take this opportunity to start to consider these implications and consider further where its unmet need is likely to go.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1 EXECUTIVE SUMMARY

i. This submission provides Gladman Developments’ written representations on the Guildford Borough Council Proposed Submission Local: strategy and sites 2017 consultation.

ii. Gladman specialise in the promotion of strategic land for residential development, with associated community infrastructure. These representations concern the following matters:

- Duty to Cooperate
- Sustainability Appraisal
- Vision
- Housing Numbers
- Site Allocations
- Evidence Base

iii. At this stage of the plan preparation process, Gladman consider that there are number of areas the Council will need to address in order to be able to deliver a sound plan, most importantly the housing requirement being planned for.

2 INTRODUCTION

2.1 Context

2.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments’ representations on the Guildford Proposed Submission Local Plan Draft for Consultation (regulation 18).

2.1.2 Through this submission Gladman have highlighted several issues with the Guildford Proposed Submission Local Plan in its current form. We submit that the plan will need to reconsider some of its policies and ensure that its evidence base is up to date and robust in light of changing circumstances and the potential changes brought about by the Housing White Paper.

2.1.3 To ensure a sufficient supply of deliverable and developable sites and to meet Guildford’s and the HMA housing needs in full, we submit that the plan should be seeking to identify additional sites, and that the process for identifying the sites currently within the plan is in need of further explanation and consideration.

2.1.4 The National Planning Policy Framework (NPPF) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- Positively Prepared – the Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.1.5 The current consultation is on proposed changes, as such this representation should be considered in the context of previous submissions made by Gladman.

3 NATIONAL PLANNING POLICY

3.1 National Planning Policy Framework and Planning Practice Guidance

3.1.1 The NPPF has been with us now for over five years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. The Framework sets
out the Government’s goal to ‘significantly boost the supply of housing’ and how this should be reflected through the preparation of Local Plans. In this regard, it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:

“To boost significantly the supply of housing, local planning authorities should:

• Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area
• Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements…”
• Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15” (Paragraph 47)

3.1.2 The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the NPPF, which requires local planning authorities to prepare a Strategic Housing Market Assessment (SHMA), working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).

3.1.3 Once a local authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152).

3.1.4 As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:

• Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need
• Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.
• Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
• Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.
• Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.
• The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
• The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.

3.2 Housing White Paper – Fixing our broken housing market
3.2.1 A government Housing White Paper was published in February 2017, and included a consultation on changes to planning policy and legislation in relation to housing, sustainable development and the environment, which expired on the 2nd May 2017. Government White Papers are often Command Papers that either contain future legislation or proposals for future legislation, therefore they provide a very clear indication of the direction of travel for government policy, which in this instance relates to Housing. In order to safeguard its local plan position, the Council will need to consider the emerging plan against the points raised within the White Paper, and monitor the progress of the consultation as the proposals within it materialise as potential reforms to the planning system. Given that the intention of the document is to have some of the proposed reforms to come into force by November 2017, it is highly likely that a number of its measures will be relevant considerations prior to the adoption of the plan.

3.2.2 The title of the White Paper makes apparent that the government considers the housing market to be broken, it is also clear from the document forward by the Prime Minister that the cost of housing is a key part of why the housing market is considered broken. In the foreword the Prime Minster states:-

“Today the average house costs almost eight times average earnings – an all-time record.”

“In total more than 2.2 million working households with below-average incomes spend a third or more of their disposable income on housing.”

“We need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system.” (Foreword from the Prime Minister)

3.2.3 The second foreword from the Secretary of State adds further to the governments thinking, particularly on the need to build new homes now, it states:-

“This country doesn’t have enough homes. That’s not a personal opinion or a political calculation. It’s a simple statement of fact”

“Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.”

“That has to change. We need radical, lasting reform that will get more homes built right now and for many years to come.”

3.2.4 The White Paper outlines further potential reforms to the plan making process, OAN methodology, and Green Belt consideration and housing delivery tests, amongst others. Gladman will point out key aspects from the White Paper in relevant sections of this representation.

3.2.5 Whilst the document is a White Paper, the Council must give consideration to what it is saying, and how it outlines the need for reform and the need for change in the planning system. It is clear that not delivering the identified housing needs of an area or a HMA is not an option moving forward.

5 SUSTAINABILITY APPRAISAL

5.1.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.

5.1.2 The Guildford Local Plan should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Guildford Local Plans decision making and scoring should be robust, justified and transparent.

5.1.3 Gladman are concerned that in a previous iteration of the plan the sustainability appraisal supported a significantly more positive approach with the Council considering itself able to deliver 14% above its then significantly higher housing requirement. The current consultation is seeking to deliver a much lower number and Gladman suggest that this approach cannot be justified.

5.1.4 Given the issues expressed above with regard to the Duty to Cooperate, and the need for the Council to consider unmet housing needs the Councils SA is not fit for purpose in justifying it’s substantially lower housing requirement.
6 OBJECTIVELY ASSESSED HOUSING NEED

6.1 Background

6.1.1 The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.

- 6.1.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a SHMA working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying “the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
  - Meets household and population projections taking account of migration and demographic change;
  - Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
  - Caters for housing demand and the scale of housing supply necessary to meet this demand.”

6.1.3 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors: Falling household formation rates; net inward migration; the need to address the under provision of housing from the previous local plan period; the results of the Census 2011; housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market; economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth; off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents; addressing affordability and delivering the full need for affordable housing in an area.

6.1.4 Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in §17 of the Framework, which states:

‘...Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.’

6.1.5 Of critical importance is what the Framework goes onto say in §158 in the section discussing Plan Making. It states here:

‘Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.’

6.1.6 Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.

6.1.7 The formal publication of the Planning Practice Guidance (PPG) in March 2014 gives further explanation to what the Framework means with regard to market signals, and sets out, in a range of paragraphs, the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. §19 and §20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extracts identify some particularly pertinent points.

‘The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.’
6.1.8 The paragraph goes on to indicate that these factors would include, but should not be limited to, land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at §17, quoted above, it seems clear that particular consideration should be given to affordability.

6.1.9 In order to consider how market signals should be taken forward §20 identifies some key concepts:

‘Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.’ (emphasis added)

6.1.10 It is therefore clear that where market signals are apparent (in any of the indicators assessed), there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the absolute level of change and the rates of change are considerations, and that local planning authorities need to carefully bench mark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and PPG are trying to tackle with regard to housing.

6.1.11 What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent, in our consideration of a number of plans that many local authorities choose to look at periods of time that are not fully representative of the depth of the housing crisis which we are currently within.

6.1.12 The problems are noted in Fixing the Foundations: Creating a more prosperous nation published by HM Treasury in July 2015. In paragraph 9.7 the report states:

‘There remains more to do. As the London School of Economics (LSE) Growth Commission found, ‘under supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand.’

6.1.13 Gladman are therefore of the view that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period that would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.

6.1.14 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgment it was stated:

“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. […] The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies”.

6.1.15 Therefore, following the exercise to identify the full, OAN for housing in an area, “Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should
be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)

6.1.16 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

6.1.17 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above,

“Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:

• specific policies in this Framework indicate development should be restricted.”
• any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or

6.1.18 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

“sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.

6.1.19 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.

6.1.20 The PPG contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.

6.2 Objective Assessment of Housing Needs for Guildford

6.2.1 Gladman are concerned with the OAN figure for Guildford and the robustness of the evidence to support it. The SHMA undertaken by GL Hearn for the authorities of Guildford, Waverley and Woking was published in 2016 which set out the full OAN for Guildford to be 693 dwellings per annum. This considered it was necessary to include an uplift to the 2012 household projections to support economic growth, improve affordability and student growth impact. Whilst a fairly positive assessment it was considered that to truly improve affordability this uplift would need to be taken significantly further than the 5% as proposed.

6.2.2 Following consultation on the draft Local Plan, an addendum to the SHMA has published solely for Guildford which is not a full assessment of the HMA. Whilst increasing the affordability uplift, still significantly less than the level it should be, this addendum has significantly reduced the uplift to support economic growth resulting in an OAN less than previously consulted on. It is considered that this is not a robust figure that is positive, justified or effective.

6.2.3 It is expected that the uplift for market signals should be at least 25%, equal to that of neighbouring Waverley, following examination of the Waverley Local Plan where the Inspector considered this to be a more appropriate figure. It is also not considered appropriate to reduce the economic growth uplift and it is considered that the Council are planning for significantly less than what should be the full OAN for Guildford.

6.2.4 We do consider that the SHMA is a robust piece of evidence, nor do we consider the proposed reduction in the housing requirement justified.

----------

8 CONCLUSIONS
8.1.1 Having considered the Guildford Submission Local Plan, Gladman are concerned about a range of matters including the housing requirement, evidence base, and delivery of some site allocations.

8.1.2 The plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. In the first instance, the Council should look again at its housing requirement and subsequent site allocations, and crucially the assessments that underpin the decisions made.

8.1.3 It is apparent that there are substantial problems with the OAN for Guildford and the subsequent housing requirement derived from it. The Council is failing to meet its requirements in meeting it’s OAN and in contributing to meeting the already known unmet housing needs of the HMA. A number of issues with the GL Hearn OAN methodology were exposed during the examination of the Waverley Local Plan Part 1, these have led to a significant increase in the housing requirement for Waverley. We consider that such an upward adjustment is also required in Guildford. The plan as written is unsound as it is not adequately planning to meet its housing requirements.

8.1.4 Furthermore even should the Council wish to put forward the argument that the constraints of the district mean that it cannot meet its housing requirement, when this requirement has been properly assessed, there is currently insufficient evidence to justify this position. Indeed the Councils previous iteration of the plan was accompanied by evidence that suggested the previously planned for housing figure was both sound and acceptable.

8.1.5 The Guildford Local Plan is therefore considered not to be sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/416</th>
<th>Respondent:</th>
<th>15689793 / Gladman Developments (Mat Evans)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

4 DUTY TO COOPERATE

4.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the previous withdrawn plan, and 13 other Local Plans since 2011, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

4.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration1, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Hart must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

4.1.3 The Local Plan as written clearly fails to meet the Duty to Cooperate. Guildford has failed to adequately, alongside its HMA wide partners, meet the unmet housing needs of the HMA. In the ongoing examination of the Waverley Local Plan, the Inspector has indicated that Waverley will be required to take 50% of Woking’s currently identified unmet housing...
need. Guildford must address how it will make a contribution towards meeting the other 50% of unmet housing need in the HMA. Furthermore, it must be remembered that this represents 50% of the currently identified figure, it is highly likely that this figure is a significant underestimation of the unmet housing needs of Woking and thus the HMA. The real figure that Guildford and Waverley will have to consider is therefore likely to increase.

4.1.4 It was apparent from the Waverley Local Plan examination that there was significant disagreement between the HMA wide authorities of Guildford, Woking and Waverley as to who should be taking what level of need. The government has made clear through the Housing White Paper that the current situation, where HMAs pass unmet need from authority to authority is untenable. The Guildford Local Plan contains insufficient evidence to justify the position of not contributing towards meeting HMA wide unmet needs, as such we do not consider that the plan soundly discharges the Duty to Cooperate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2285</th>
<th>Respondent:</th>
<th>15689793 / Gladman Developments (Mat Evans)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( No )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

7 GUILDFORD LOCAL PLAN

7.1 Vision and Objectives

7.1.1 Gladman are concerned that the vision outlined in the previous Local Plan has been significantly watered down by a general reduction in development levels across the area. As expressed in other areas of this representation we do not consider these changes can be justified by evidence. It is our concern therefore that the vision from the plan is fundamentally flawed and is not justified, effective, positively prepared or in accordance with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/4292</th>
<th>Respondent:</th>
<th>15689953 / Environment Agency (Oliver Rathmill)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1.1 Environment Agency Position on Plan as a whole

1.1.1 Points of soundness summary
We welcome and support a number of the changes that have been incorporated into the Plan since we reviewed the Draft Guildford Borough Local Plan: strategy and sites dated July 2014. However, we consider the Plan to be UNSOUND in its current form due to issues relating to:

- Infrastructure Delivery Plan – Water quality
- Flood Risk Sequential and Exception Tests - site allocations and the justification for promoting certain sites
- Policy P4 – Flooding, flood risk and groundwater production zones
- Site Allocation Policies – safe access and egress of allocated sites A5 and A13

In its current form the Plan does not meet the tests of soundness in terms of being justified, effective or consistent with national policy. These points are summarised below.

- With regards to water quality the Plan does not reflect the evidence submitted in the Infrastructure Delivery Plan for wastewater capacity issues, which may result in an adverse impact on water quality. The Plan is not consistent with the National Planning Policy Framework (NPPF), paragraph 109, and is not justified by a robust evidence base.
- With regards to the Flood Risk Sequential and Exception Tests, we do not consider that sufficient evidence has been presented in this supporting document to justify the conclusions drawn in the Plan with respect to the allocation of certain sites. Without this evidence the Plan is not justified.
- With regards to Policy P4 we do not consider that sufficient reference has been made to the impacts of climate change on the flood risks associated with development. We consider that without specific mention of the flood risks associated with climate change that the Plan is not consistent with paragraph 99 of the NPPF.
- With regards to flood risk three of your allocated sites; A5: Jewsons, Walnut Close, Guildford; A13: Kernal Court, Walnut Close, Guildford; and A14: Wey Corner, Walnut Tree Close, Guildford, do not have the evidence on access and egress to support their allocation in the Plan. Without this evidence the deliverability of these sites is questionable and their inclusion is not consistent with NPPF paragraphs 100-102 of the NPPF.

Further details on these issues are provided in section 1.2, 1.3, 2.1 and 3.1 of this letter respectively.

1.2 Supporting Document: Draft Infrastructure Delivery Plan June 2016

1.2.1 Points of Soundness
We welcome paragraph 2.22 in the Plan and promotion of the principle that “Pressure on existing infrastructure and additional stress caused by planned growth must be addressed”. However, within the draft Infrastructure Delivery Plan (IDP) there is no evidence relating to environmental capacity and water quality and the impact of the growth being proposed in terms of the sewerage infrastructure needs and the impact of Water Framework Directive (WFD) objectives. Without this evidence the Plan is not based on robust evidence or consistent with national planning policy and is unsound.

Paragraph 3.10 and 3.11 state that Thames Water have advised that there is insufficient wastewater infrastructure in the Borough to satisfactorily accommodate some of your proposed development sites.

It is indicated that smaller allocated sites will provide the majority of the supply in the first five years of the Plan. However, some of these smaller sites have also been identified as causing an infrastructure concern for Thames Water. It is likely that planned Sewage Treatment Works (STW) upgrades will be in line with the next business planning period (2020-2025), unless additional funding can be obtained. The schedule of development indicates 1050 homes will be built before 2020. This suggests housing is proposed in advance of adequate infrastructure being in place which would not be consistent with paragraph 177 of the NPPF.

Therefore, we do not believe that the Plan is justified by your local evidence base or consistent with national planning policy and guidance.

1.2.2 Overcoming this point of unsoundness
To overcome this point of unsoundness we recommend that a Water Cycle Study
(WCS) (or equivalent assessment) needs to be completed to assess the impacts on water quality and WFD objectives of the cumulative growth proposed within the Plan (13,860 homes).

1.3 Supporting Document: Sequential and Exception Tests

1.3.1 Points of Soundness

Within the Plan and this supporting documents we find that the Plan is unsound because the flood risk sequential and exception tests have not been appropriately applied to justify the conclusions drawn in the Plan.

Point 1 – It is unclear from Appendix A (Stage 2) why some sites appearing to be ranked as having low flood risk in the table appear to have been discounted due to “Suitability concerns: high flood risk” while other sites with higher flood risk have been promoted as site allocations.

For example, sites LAA reference 2167 and 2168 have both been considered as potential traveller accommodation sites and both appear to be in Flood Zone 1 but have been discounted due to “Suitability concerns: high flood risk”. In contrast, LAA reference sites 2106 and 241 both containing Flood Zone 3 have both been promoted to site allocations A54 and A50 respectively.

On further examination of Appendix A (Stage 3) in the Flood Risk Sequential and Exception Test and the associated Site Proformas within the Level 2 Strategic Flood Risk Assessment it does become clear that the potential allocated sites have a flood zone breakdown as follows:

<table>
<thead>
<tr>
<th>Site Allocation</th>
<th>A50</th>
<th>A54</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAA Reference</td>
<td>241</td>
<td>2106</td>
</tr>
<tr>
<td>Address</td>
<td>Land at Whittles Drive, Aldershot Road, Normandy</td>
<td>Lakeview, Lakeside Road, Ash Vale</td>
</tr>
<tr>
<td>Flood zone 1</td>
<td>73.7%</td>
<td>72.7%</td>
</tr>
<tr>
<td>Flood zone 2</td>
<td>20.3%</td>
<td>9.6%</td>
</tr>
<tr>
<td>Flood zone 3a</td>
<td>6%</td>
<td>17.7%</td>
</tr>
<tr>
<td>Flood zone 3b</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

As such both sites A50 and A54 appear to be deliverable. However, as no site assessment or further explanation is provided for excluding 2167 and 2168 other than the phrase “high flood risk” when considered against the reasonable alternatives the decision made to exclude these sites and include site A50 and A54 appears to be unjustified.

Point 2 – Appendix A (Stage 2) of the supporting evidence document Flood Risk Sequential and Exception Test provides a list of all the potential sites provided to GBC for consideration (after those sites which are not suitable in planning policy terms had been excluded in Stage 1). These have been ranked in order of flood risk preference (from least preferable to most preferable) based on the highest flood zone classification within the site. Following an assessment, where sites have not been taken forward as potential site allocations you have provided a brief reason for not doing so.

However, many sites have been discounted for being “Not identified in the Greenbelt and Countryside Study” but no further detail is given in the table or Proposed Submission Local Plan (2016) – Flood Risk Sequential and Exception Test methodology and outcomes. It is unclear why this reason may overrule flood risk, a constraint that potentially places people and property at severe risk.

1.3.2 Overcoming these points of unsoundness

Point 1 – We recommend that you expand upon the discounting reason “high flood risk” within this table to provide justification of the decisions made.
Point 2 – We recommend that an explanation is given in the methodology to justify why “Not identified in the Greenbelt and Countryside Study” is reason for discounting potential allocation sites.

1.3.3 Points of clarity and accuracy
Within Appendix A (Stage 3) there appears to be an error on the heading of columns the Stage 3 table (pages 35-38). The columns to the right of the Stage 3 table indicate the compatibility of different flood risk categories according to the flood zone in which they are located. The positioning of “Exception Test” in these columns appears to have been incorrectly carried out.

For instance, Table 3 (reference ID 7-067-20140306) of the National Planning Practice Guidance (NPPG) does not indicate that the Exception Test is required for less vulnerable development but the Stage 3 table indicates that it is for a number of sites. Table 3 of the NPPG also indicates that more vulnerable development in flood zone 3a should pass the Exception Test. However, your Stage 3 table indicates that it would not be an appropriate development type for this flood zone, while highly vulnerable development would be should it meet the requirements of the Exception Test.

In contrast this does appear to have been carried out correctly in Appendix 1 Stage 2. The route of this problem may be a formatting issue with the columns in the Stage 2 table which do not follow the sequence in the NPPG:

<table>
<thead>
<tr>
<th>Essential infrastructure</th>
<th>Highly vulnerable</th>
<th>More vulnerable</th>
<th>Less vulnerable</th>
<th>Water compatible</th>
</tr>
</thead>
</table>

We believe that the Stage 3 table has been incorrectly labelled in this sequence:

<table>
<thead>
<tr>
<th>Highly vulnerable</th>
<th>More vulnerable</th>
<th>Less vulnerable</th>
<th>Water compatible</th>
<th>Essential infrastructure</th>
</tr>
</thead>
</table>

Please can you confirm this formatting issue is indeed the reason behind this inconsistency with this essential element of your Local Plan evidence base?

1.4 Additional Comments on the Plan as a whole
We welcome and support the Spatial Vision (Section 3.0 – Our vision and ambition) to guide the creation of the plan. However, alongside the existing themes outlined in the Spatial Vision we would recommend the inclusion of a section on the implementation of a green and blue infrastructure network that contributes to protecting and enhancing the water environment, improving habitat connectivity between designated sites and important habitats, managing flood risk, reducing diffuse pollution and re-connecting people with nature.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/7962  Respondent: 15689953 / Environment Agency (Oliver Rathmill)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A13

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
3.1.2 Policy A13: Kernal Court, Walnut Close, Guildford
Although this site lies within flood zone 1 we noted that safe access may be questionable. It does not appear that this has been taken into account and no evidence that demonstrates that safe access is achievable has been provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7963</th>
<th>Respondent:</th>
<th>15689953 / Environment Agency (Oliver Rathmill)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A14</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3.1.3 Policy A14: Wey Corner, Walnut Close, Guildford
This site lies partly within flood zone 2 and 3 we note that safe access may be questionable. It does not appear that this has been taken into account and no evidence that demonstrates that safe access is achievable has been provided.

3.2 Overcoming this point of unsoundness
In its current form the Plan is not consistent with national planning policy as it fails to justify the allocation of these sites. At present evidence is not in place to demonstrate safe access and egress. To justify the allocation of these sites in the Plan an assessment should be made of the safe access and egress routes from these sites to identify the hazards associated them. We consider that these assessments should be made prior to the allocation of these sites for future ‘more vulnerable’ residential development.

Where hazards are greater than a very low hazard consideration should be given to whether flood plans specific to the development would be acceptable. There should be sufficient information to enable Emergency Planners to determine if evacuation is possible. Issues to cover may include the rate of onset of flooding, the availability of flood warnings, duration of flooding, depth of flooding and the length of the evacuation route.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7961</th>
<th>Respondent:</th>
<th>15689953 / Environment Agency (Oliver Rathmill)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
3.1 Points of Soundness
In our letter dated 19 September 2014 regarding the DRAFT Guildford Borough Local Plan: strategy and Sites (July 2014) we raised concerns about the provision of safe access and egress to a number of allocated sites. While some of these sites appear to have had their proposed use flood risk classification changed from ‘more vulnerable’ to ‘less vulnerable’, or have been removed from the site allocations list entirely; two sites, detailed below, are still allocated for ‘more vulnerable’ housing development. At present the Plan is unsound as the evidence is not in place to demonstrate that these safe access and egress can be provided to these sites:

3.1.1 Policy A5: Jewsons, Walnut Close, Guildford
Although this site lies within flood zone 1 we noted that safe access may be questionable. It does not appear that this has been taken into account and no evidence that demonstrates that safe access is achievable has been provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/17618  Respondent: 15689953 / Environment Agency (Oliver Rathmill)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.2 Policy I4 – Green and blue infrastructure
We welcome and support this policy and specifically the commitment to protect and enhance waterways.

2.2.1 Points of accuracy and clarity
Paragraph 4.6.35 – We welcome the production of a separate Development Management Policy (DMP) and a Green and Blue Infrastructure Supplementary Planning Document (SPD) to set out how ecological networks will be managed and enhanced. We would like to be involved in this and suggest that separate policies and guidance are written for biodiversity and the water environment.

Monitoring Indicators Table – In the interests of clarity and accuracy we note that progress on WFD objectives will be reported by the Environment Agency, not Natural England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/17617  Respondent: 15689953 / Environment Agency (Oliver Rathmill)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
2.1 Policy P4 – Flooding, flood risk and groundwater source production
We support the inclusion of a specific policy for flood risk and welcome the protection of groundwater within Policy P4. In addition, we pleased to see the distinction between developed and undeveloped flood zone 3b explained and included within the policy wording, which provides clarity on what is appropriate development in the functional flood plain.

2.1.1 Points of soundness
We do not consider that sufficient reference has been made to the impacts of climate change on the flood risks associated with development. The NPPF sets out how the planning system should help minimise vulnerability and provide resilience to the impacts of climate change. We consider that without specific mention of the flood risks associated with climate change that the Plan is not consistent with paragraph 99 of the NPPF.

2.1.2 Overcoming this point of unsoundness
We recommend that in accordance with the paragraph 99 of the NPPF Policy P4 can be re-worded to reference climate change. For instance:

a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime, taking into account climate change, including access and egress, without increasing flooding elsewhere, and where possible, will reduce flood risk overall

2.1.3 Points of accuracy and clarity
In the interests of accuracy and clarity we recommend that this Policy is retitled to reflect the correct terminology:

Policy P4 – Flooding, flood risk and groundwater protection zones

In the interest of accuracy and completeness we suggest that the following is added to the end of Paragraph 4.3.39:

All other land surrounding this is important flow routes and should be retained.

In the interest of accuracy and clarity we suggest that the following is added to the details regarding development in areas at risk of flooding in Policy P4:

site drainage systems are appropriately designed taking into account of storm events up to 1 in 100 year chance of flooding with an appropriate allowance for climate change allowance.

While Policy P4 makes reference to the protection of Groundwater Source Protection Zones, however, in-line with paragraph 109 of the NPPF in the interests of accuracy and clarity we suggest the following wording:

Development within Groundwater Source Protection Zones and Principal Aquifers will only be permitted provided that it has no adverse impact on the quality of the groundwater resource and does not put at risk the ability to maintain a public water supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

---

**Comment ID:** SQLP16/2001  **Respondent:** 15689953 / Environment Agency (Oliver Rathmill)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Final comments
Once again, thank you for contacting us. Our comments are based on our available records and the information submitted to us. Please quote our reference number, letter subject and letter date in any future correspondence.

We would like to work with you further on your Local Plan to ensure that all of the potential issues are satisfactorily addressed and to enable Guildford Borough to have a robust, effective local plan that is reflective of national planning policy and your local evidence base.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp173/490  **Respondent:** 15689953 / Environment Agency (Oliver Rathmill)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.4 Appendix C Infrastructure Schedule
We note that your WQA is mentioned on page 345. It is suggested the purpose of this document is just to assess waste water infrastructure. This is only one half of the assessment. The other is considering the environmental capacity of the effluent receiving waters. This environmental capacity consideration has been included as part of the assessment that AECOM has undertaken on behalf of the council. For the sake of accuracy and clarity we recommend that this is updated to include this aspect of the WQA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp172/3650  **Respondent:** 15689953 / Environment Agency (Oliver Rathmill)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? (No), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

3.1.1 Sites which are wholly in the flood plain are also within the 1 in 20 year flood plain

We note that these sites POLICY A2 and A6 are designated flood zone 3b developed and have been allocated within flood zone 3b. We acknowledge that Guildford Borough Council have provided reasoning for these site allocations within the evidence base. We do not wish to raise a point of soundness regarding these allocations and leave it for the Inspector to provide their view on this matter.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3652  **Respondent:** 15689953 / Environment Agency (Oliver Rathmill)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? (No), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

3.1.2 Assessment of climate change

Within your plan the following four sites are based on high level flood risk information:

- POLICY A39: Land near Horsley railway station, Ockham Road, North, East Horsley (assessment based on Flood Zones)
- POLICY A40: Land to the north of West Horsley (assessment based on Flood Zones)
- POLICY A50: Land at Whittles Drive, Aldershot Road, Normandy (assessment based on Flood Zones)
- POLICY A54: Lakeview, Lakeside Road, Ash Vale (assessment based on detailed flood model (Blackwater 2007) 1 in 100 year flood)

Although you have deemed these to have passed the flood risk sequential test as noted below we would expect that at planning application stage detailed flood modelling is undertaken.

We note that the new climate change allowances haven’t been specifically mentioned in the Level 2 SFRA or local plan. However, the majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity we recommend that this approach of using the 1 in 1000 year flood event to account for climate change is clearly set out in the SFRA Level 2.

If these sites are adopted, at the planning application stage we would expect an assessment of climate change (using the new allowances) to be undertaken by applicants. We recommend applicants consult with the most recent national climate change guidance including our Thames Climate change guidance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
3.1.2 Assessment of climate change
Within your plan the following four sites are based on high level flood risk information:
POLICY A39: Land near Horsley railway station, Ockham Road, North, East Horsley (assessment based on Flood Zones)
POLICY A40: Land to the north of West Horsley (assessment based on Flood Zones)
POLICY A50: Land at Whittles Drive, Aldershot Road, Normandy (assessment based on Flood Zones)
POLICY A54: Lakeview, Lakeside Road, Ash Vale (assessment based on detailed flood model (Blackwater 2007) 1 in 100 year flood)
Although you have deemed these to have passed the flood risk sequential test as noted below we would expect that at planning application stage detailed flood modelling is undertaken.
We note that the new climate change allowances haven’t been specifically mentioned in the Level 2 SFRA or local plan. However, the majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity we recommend that this approach of using the 1 in 1000 year flood event to account for climate change is clearly set out in the SFRA Level 2.
If these sites are adopted, at the planning application stage we would expect an assessment of climate change (using the new allowances) to be undertaken by applicants. We recommend applicants consult with the most recent national climate change guidance including our Thames Climate change guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
3.1.1 Sites which are wholly in the flood plain are also within the 1 in 20 year flood plain
We note that these sites POLICY A2 and A6 are designated flood zone 3b developed and have been allocated within flood zone 3b. We acknowledge that Guildford Borough Council have provided reasoning for these site allocations within the evidence base. We do not wish to raise a point of soundness regarding these allocations and leave it for the Inspector to provide their view on this matter.

POLICY A6: North Street redevelopment, Guildford.
The local plan policy requirement (13) states: ‘Avoid development of high or medium vulnerability uses in flood zone 2 (medium risk) and flood zone 3 (high risk)’. This should read ‘more or highly vulnerable uses’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1833  Respondent: 15689953 / Environment Agency (Oliver Rathmill)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2 Points of clarity and accuracy
2.1 Policy ID1: Infrastructure and delivery
The policy may benefit from incorporating some of the recommendations that came from the Water Quality Assessment (WQA) undertaken by AECOM.
For major developments in the Guildford, Ripley, and Ash Vale Sewage Treatment Works (STW) catchments it is recommended that the council embeds a development control policy within the local plan. This could require developers to provide evidence that they have consulted the sewer undertaker regarding capacity of the sewer network. Drainage strategies should also be submitted as part of the application to enable the sewer undertaker and the Environment Agency to fully assess the potential impacts on the sewer network. Developments should not be occupied before capacity of the sewer network to accommodate flows and capacity at the works is in place to treat to the required standard. For cases where capacity is not in place, the council could include wording in the policy on Grampian conditions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1834  Respondent: 15689953 / Environment Agency (Oliver Rathmill)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2.2 Policy ID4: Green and blue infrastructure

We welcome and support the recognition of the differences between green and blue infrastructure. We recommend that use of the word “waterways” is changed to “watercourses”.

2.2.1 Green and Blue Infrastructure Supplementary Planning Document, paragraph 4.6.35

We recommend that separate development management policies are written for Biodiversity, Green Infrastructure and Open Spaces and The protection and enhancement of river corridors. Please refer to policies DM11, DM12, DM13, DM14, DM15 and DM16 of Wycombe District Council’s Local Plan. We would also welcome the inclusion of a separate advice note on watercourses, similar to the one produced for Wycombe District Council (River Wye Advice Note) which really values the watercourses as an important asset in its district and provides advice to developers and landowners on how to protect and enhance the river environment. The River Wye Advice Note includes sections on the design of new riverside development (and the inclusion of buffer zones); landscape design of the river bank; public access; surface water run-off and the avoidance of pollution and weirs/barriers to fish passage. We’d be happy to work with the Council on this.

2.2.2 Blue Infrastructure

We welcome the reference to the Water Framework Directive in paragraph 4.6.40. However, we recommend that the following wording is used for the first sentence in this paragraph:

“The Water Framework Directive (WFD) requires all member states to achieve good ecological and good chemical status for all groundwater and surface water waterbodies by 2027 at the latest.”

2.2.3 Policy ID4: Green and blue infrastructure

In policy point (6) we recommend that mention of about non-native invasive species. Developments can result in the spread of non-native invasive species which have devastating ecological and economic impacts. Where identified, these species should be eradicated/controlled under an agreed scheme.

In policy point (7) we recommend that the second sentence is replaced with: “Development proposals that are likely to have an adverse impact on the functions and setting of any watercourse and its associated corridor will not be permitted. Development should seek to conserve and enhance the ecological, landscape and recreational value of the watercourse and its associated corridor through good design and seeking out opportunities to deliver WFD objectives.”

This policy should identify potential opportunities for aligning with Water Framework Directive (WFD) objectives and consider the pressures and aims outlined in the River Basin Management Plan (RBMP). For instance, many of the actions that have been highlighted to bring the River Wey into good ecological status involve re-naturalising the bank by removing hard engineering, encouraging natural buffer zones to the watercourse, removing barriers to fish and eel passage, reducing diffuse pollution and tackling non-native invasive species. Some WFD objectives can only be delivered via catchment wide/cross-boundary planning which the Wey Landscape Partnership (currently hosted by the Surrey Wildlife Trust) was set up to achieve - please see comment above on working in partnership and the Wey Habitat Restoration Strategy.

2.2.4 Buffer zone

Paragraph 4.6.48 to a buffer zone for non-navigable rivers. Please note that all rivers (navigable or not) should be protected and enhanced by an 8m wide minimum undeveloped buffer zone (measured from bank top) on both sides of the river. Bank top is defined as the point at which the bank meets the level of the surrounding land. 8m is the minimum required for main rivers under the Thames Region land drainage byelaws.

However, on a greenfield site where there is plenty of land available, we would expect to see a wider buffer zone of a minimum of 10m on both sides of the watercourse that varies in size and shape to include larger areas. It may be appropriate to look at a much larger buffer on certain sites but this should be assessed on a site by site basis. The provision of a buffer zone should also be supported by a long term ecological management plan.

2.2.5 Key evidence
We note that the WQA is not referenced with the key evidence green box but this document provides evidence to underpin this policy and should therefore be included.


**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

“watercourses”.
“The Water Framework Directive (WFD) requires all member states to achieve good ecological and good chemical status for all groundwater and surface water waterbodies by 2027 at the latest.”
“Development proposals that are likely to have an adverse impact on the functions and setting of any watercourse and its associated corridor will not be permitted. Development should seek to conserve and enhance the ecological, landscape and recreational value of the watercourse and its associated corridor through good design and seeking out opportunities to deliver WFD objectives.”

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1831</th>
<th>Respondent: 15689953 / Environment Agency (Oliver Rathmill)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P4</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1 Points of soundness

1.1 Points of soundness summary
We welcome and support a number of the changes that have been implemented since we reviewed the Proposed Submission Local Plan: strategy and sites dated June 2016. However, we consider the plan to be UNSOUND in its current form due to issues relating to flood risk.

1.2 Policy P4: Flooding, flood risk and groundwater protection zones
We consider that Policy P4 does not reflect some of the conclusions within the evidence submitted in the Strategic Flood Risk Assessment (SFRA) Level 1. Therefore, we do not consider this policy to be justified by the evidence base or consistent with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG). On page 5 of the Level 1 SFRA it is made clear with regards to development within the functional floodplain that “there should be no increase in development vulnerability or intensification in use”. We note that this is not reflected in Policy P4.

1.2.1 Overcoming this point of soundness
In order to overcome this point of soundness we recommend that Policy P4 (3) is updated to reflect your SFRA:
“Development proposals in the ‘developed’ flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no increase in development vulnerability or intensification in use. Proposals within these areas should facilitate greater floodwater storage.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

"and there will be no increase in development vulnerability or intensification in use"
2.3 Policy P4: Flooding, flood risk and groundwater protection zones
We welcome the inclusion of a majority of the advice we provided in July 2016, in particular the specific mention of the flood risks associated with climate change within Policy P4 (2) (c).
2.3.1 Paragraph 4.3.36
For the sake of clarity we recommend adding the date of the Flood and Water Management Act (2010). In addition, specific mention of Thames Water as a Risk Management Authority could be made, as they have a significant role in relation to managing flood risk from sewers.
2.3.2 Paragraph 4.3.42
We welcome the recognition of sensitive groundwater receptors within the Borough. We recommend that reference is made to the most up-to-date version of the Environment Agency’s groundwater protection position statements which can be found at:
2.3.3 Site allocations and groundwater protection
We wish to note that sites within the inner source protection zone (SPZ1) often have specific requirements to protect groundwater. We recommend that the following groundwater issues are added to the list of key considerations for the preferred sites listed in Appendix A to this letter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Appendix A – Sites with groundwater protection concerns**

**Site Key Consideration**

<table>
<thead>
<tr>
<th>Site</th>
<th>Consideration</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
<td>Principal Aquifer</td>
</tr>
<tr>
<td>A3</td>
<td>Northern tip of site in SPZ1, Principal Aquifer</td>
</tr>
<tr>
<td>A5</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A6</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A7</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A8</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A9</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A11</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A12</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A13</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A14</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A15</td>
<td>Partly in SPZ1</td>
</tr>
<tr>
<td>A18</td>
<td>SPZ1</td>
</tr>
<tr>
<td>A23</td>
<td>The site is a proposed burial ground, special consideration is required regarding the depth to groundwater. Refer to the appropriate section of the Groundwater protection position statements guidance *</td>
</tr>
<tr>
<td>A24</td>
<td>SPZ1 and historic landfill on part of site.</td>
</tr>
<tr>
<td>A26</td>
<td>Principal Aquifer</td>
</tr>
<tr>
<td>A37</td>
<td>Principal Aquifer</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2775</th>
<th>Respondent:</th>
<th>15689953 / Environment Agency (Oliver Rathmill)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P4</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Within your plan the following four sites are based on high level flood risk information:

- POLICY A39: Land near Horsley railway station, Ockham Road, North, East Horsley (assessment based on Flood Zones)
- POLICY A40: Land to the north of West Horsley (assessment based on Flood Zones)
- POLICY A50: Land at Whittles Drive, Aldershot Road, Normandy (assessment based on Flood Zones)
- POLICY A54: Lakeview, Lakeside Road, Ash Vale (assessment based on detailed flood model (Blackwater 2007) 1 in 100 year flood)

Although you have deemed these to have passed the flood risk sequential test as noted below we would expect that at planning application stage detailed flood modelling is undertaken. We note that the new climate change allowances haven’t been specifically mentioned in the Level 2 SFRA or local plan. However, the majority of allocated sites have detailed modelling where the 1 in 1000 year (0.1% annual exceedance probability) is available, these sites have been assessed against the 1 in 1000 year flood. For the purpose of accuracy and clarity we recommend that this approach of using the 1 in 1000 year flood event to account for climate change is clearly set out in the SFRA Level 2. If these sites are adopted, at the planning application stage we would expect an assessment of climate change (using the
new allowances) to be undertaken by applicants. We recommend applicants consult with the most recent national climate change guidance including our Thames Climate change guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

 Assumptions adopted

I understand the number of houses proposed arises from a strategic housing market assessment (SHMA) that was generated by a consultant’s mathematical model the basis of which has not been revealed to any member of the public nor apparently to Guildford Borough Council. This evidences a lack of rigorous testing and a willingness to conceal which is clearly unacceptable on both counts.

Having taken the SHMA housing number (the basis of which is unknown) it is understood that this has been further increased by Guildford Borough Council to give a population increase which is almost 70% higher than the official national estimates for population growth in the Borough. One is therefore led to question the rationale and wisdom of those who have been responsible for the preparation of these proposals.

Effectively all of these lead to an increase of up to 35% in existing West Horsley households – which is greater than any other single area within the Borough and certainly dramatic by any standards.

How can any public officer seriously propose such a dramatic impact upon the lives of people without a more rigorous and study and understanding of the parameters adopted and basis of the proposals put forward?

As submitted, these proposals clearly require a total “re-think” as they affect West Horsley and perhaps other locations as well should the same fundamental discrepancies have similar application elsewhere.

As such, I wish to formally object to the proposals submitted and suggest that they require a complete reconsideration and that the basis on which they have been considered is not only flawed but requires greater transparency to permit meaningful consideration, not only by the officers who have put forward these proposals but also by the electorate that they are effectively paid to look after!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have been a resident of West Horsley for some 24 years and write to express profound regret at the proposals which have been introduced which in my opinion lack careful consideration and wish to raise the following observations by way of an objection to these proposals.

I would first add that I am not directly affected by the development proposals but like many others, are aghast at the lack of diligence that is evident in the proposals which have been produced and comment as follows.

Proposals for removal of West Horsley and East Horsley villages from the green belt

At a time when properties within Central London remain substantially vacant in exclusive residential areas then to undertake further residential development outside the core areas of population, (i.e. Central London and within the ring of the M25), will lead to increased travelling time for commuters, lack of consideration for the environment and a lack of “sustainable” development. Far better use could be made of developments in existing “brown field” sites with high rise developments where people will actually choose to live rather than consuming acres of good quality agricultural land or land situated within the established green belt. If an encroachment is made on the green belt, then quite simply – where will this stop? Increased travelling times for those leaving London at weekends to enjoy public open space will inevitably rise and this will lead to further environmental damage. The green belt has served the South of England well for over 50 years and there is no good reason to introduce such a change – especially given that the population projections maybe impacted by recent political development such as the withdrawal from the EU and the projections on population growth prepared by Central Government may now be considered wholly erroneous.

Increase of some 385 homes to West Horsley and some 100 homes to East Horsley

It will be noted that the proposed figures for additional housing are in addition to those which have already been provided for in the proposed Parish development sites. However, no real consideration appears to have been given to the impact upon the infrastructure which is already overloaded in terms of the following:

1. local schools are full and already over-subscribed with more demand than places available;
2. medical facilities are already stretched;
3. drainage is inevitably inadequate;
4. the existing highway system is inadequate to take further population growth of the levels proposed without leading to severe safety concerns and increases in the number of accidents to both pedestrians, cyclists and other road users;
5. car parking within both East and West Horsley is limited and is already at capacity at Horsley Station. Given the expectation that the majority of the proposed housing will be sold to commuters, this will simply exacerbate parking within the existing centre which is already full. What though has been given to this?
6. it is also noticeable that the percentage of new homes proposed within the proposed “Guildford Plan” involves an increase of some 35% more than the existing number of houses in the Parish compared to 16% in Ash and Tongham District Council and just 11% in Guildford Town – the latter location in particular benefiting from substantially superior facilities and more readily capable of taking such growth as an appendage to an established urban area!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development of over 2,000 house village at Ockham (the former Wisley Airfield)

The proposal at this location of some 2,000 houses with mixed housing, retail, commercial, traveller and school development under two miles away would be significant in itself. To further compound this with proposed extensive developments at Burnt Common (400 houses and commercial developments and Gosden Hill Farm, Burpham 2,000 and mixed used developments) in addition to the impact upon West Horsley of the proposed developments within those Parishes, is more reflective of the form of development one might see in a Stalinist society rather than a caring and listening, democratic society. It also evidences a total lack of real consideration for residents within the districts concerned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7984</th>
<th>Respondent: 15693153 / Zurich Assurance Ltd</th>
<th>Agent: Barton Willmore LLP (Sinéad Morrissey)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

INTRODUCTION AND OVERVIEW

These representations have been prepared by Barton Willmore LLP on behalf of Zurich Assurance Limited and their fund managers Columbia Threadneedle (hereafter referred to as ‘Zurich’) in respect of their landholding at Broadford Business Park, Broadford Park, Shalford GU4 8ED, which lies to the south of Guildford.

These representations are submitted in response to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites (‘the Proposed Submission GBLP’), which Guildford Borough Council (GBC) has published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (‘the Local Planning Regulations’) for a 6 week period on the 6 June 2016.

Zurich previously submitted representations responding to the Draft Local Plan: Strategy and Sites (‘the Draft GBLP’), which Guildford Borough Council (GBC) has published for consultation under Regulation 18 of the Local Planning Regulations that was carried out between July and September 2014. The Draft GBLP outlined the draft strategic policies for the borough and proposed allocation of sites for various types of development, including residential, so to realise GBC’s vision, aims and spatial strategy.

GBC’s Local Development Scheme (LDS), approved at the meeting of the Council’s Executive on 29 September 2015, explains that following the completion of the current consultation, the Proposed Submission GBLP is to be submitted to the Secretary of State (SoS) for independent examination in December 2016. An Examination in Public (EiP) is proposed for April 2017. Subject to the Examiner’s findings, GBC anticipate it will adopt the new GBLP as the Development Plan for
Guildford Borough in December 2017, at which stage it will replace the saved policies of the current adopted Local Plan (2003).

Overview

The Strategic Vision for Guildford Borough, outlined in Section 3 of the Proposed Submission GBLP, describes GBC’s plan for sustainable growth of the borough up to 2033. The vision identifies four key core themes, namely society, environment, economy and infrastructure, which will be used to inform the delivery of GBC’s strategic objectives.

Due to a number of factors, there is insufficient land available within the Borough’s existing urban areas and village settlements to accommodate the objectively assessed needs of the area. As recognised by GBC within the Proposed Submission GBLP, “exceptional circumstances” justify the allocation of land currently within the Green Belt to make an important contribution towards meeting development needs and to facilitate sustainable patterns of development

Broadford Business Park, Shalford

Broadford Business Park (hereafter referred to as ‘the Site’), which these representations focus upon, is previously developed land (PDL) and occupied by a number of buildings currently used as offices (Class B1(a)) and for light industrial (Class B1(c)) purposes. A more detailed description of the Site is set out at Section 2 of these representations.

The Site was first identified as a prospective development site in the Guildford Borough Land Availability Assessment (LAA) (current version dated February 2016) (LAA ref: 2186). Subsequently, the Site was allocated for redevelopment as part of the Draft GBLP (ref: Site 81). The site allocation has been retained as part of the Proposed Submission GBLP (ref: Policy A34) and has been assessed as being capable of delivering 100 new homes in place of the existing employment uses.

Zurich supports the proposed site allocation, as set out in the Proposed Submission GBLP, for a residential development. The Site can make a meaningful contribution to the housing requirements of Shalford and the wider spatial and development aspirations for the borough.

The indicative masterplan proposals and technical documents that accompany these representations demonstrate that the following can be delivered during the plan period:

- The delivery of up to 100 new homes (including affordable housing), to reflect GBC’s preferred tenure mix;
- Design-led approach that enhances the setting of the adjacent conservation area;
- High quality hard and soft landscaping to enhance the setting of the nearby Area of Great Landscape Value;
- Improved flood attenuation and mitigation measures to reduce flood risk and surface water runoff rates; and
- The opportunity to secure financial contributions through the planning application process and New Homes Bonus to enhance local services and infrastructure.

To demonstrate the deliverability of the Site, these representations are accompanied by the technical documents listed below. The corresponding document reference number has been included for ease of reference:

- BBP2: Design Statement, including Illustrative Masterplan prepared by John Thompson and Partners;
- BBP3: Commercial Agents Report prepared by Savills;
- BBP4: Flood Risk Advice Letter prepared by WSP;
- BBP5: Landscape and Visual Commentary prepared by Scarp Landscape; and
- BBP6: Transport Note prepared by TTP.

Overarching Policy Context

The representations will have regard to paragraph 14 of the NPPF, which states that at the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
1. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
2. Specific policies in this Framework indicate development should be restricted.

Zurich’s representations seek to support GBC in ensuring that the Proposed Submission GBLP meets national planning policy and guidance within the context of the tests of soundness identified at paragraph 182 of the NPPF and the guidance contained in Planning Practice Guidance (PPG) relevant to the preparation of Local Plan (ref ID: 12). Paragraph 182 of the NPPF explains that the Local Plan will be examined by an independent Inspector, whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Whilst having regard to the overall objectives of the Proposed Submission GBLP, particular attention will be given to demonstrate that the Site is free from constraint and meets the availability, suitability and deliverability tests referred to in paragraph 47 of the NPPF. Zurich’s representations include technical assessments addressing the key policy considerations and demonstrating how the Site could be brought forward through an indicative masterplan and accompanying Design Statement that has been prepared by JTP architects.

General analysis of the policies particularly relevant to Zurich’s interests at the Site is provided. Where Zurich are proposing changes to Policy, these are highlighted in bold whilst all proposed deletions are struck through.

SITE DESCRIPTION

Broadford Business Park is situated to the south-west of the village, and identified settlement, of Shalford. The 1.5 hectare site is within the single freehold ownership of Zurich. An aerial photograph of the Site is included in Figure 1 below.

This previously developed site falls within the Metropolitan Green Belt and forms part of the locally designated Area of Great Landscape Value (AGLV) and Corridor of the River Wey (see Figure 2 below). Notably, the Site is located within 5 – 7km of the Thames Basin Heath Special Protection Area (SPA), which is beyond the zone of influence on the SPA as determined by Natural England. The LAA 2016 advises that development at the Site may have an impact on the SPA, judged on a case by case basis, and in that respect GBC’s draft Infrastructure Delivery Plan (IDP) (June 2016) confirms that a contribution may be required to the Chantry Woods and Tyting Farm SANGs.

The Site is occupied by seven commercial buildings (extending to circa 6,500 sqm) that range from two to three storeys in height, namely:

- Bishopsgate House;
- Broadford House and Park House;
- Narthfield House and Southfield House;
- River House; and
- Captia House.

Two single storey outbuildings are located towards the northern site boundary. The buildings on the Site benefit from office (Class B1(a)) and light industrial (Class B1(c)) uses. The remainder of the Site is covered by block paving used for car parking that are interspersed with small areas of soft landscaping and trees. The existing trees along the eastern boundary adjacent to the River Wey provide some screening to the open countryside beyond.
As can be seen from Figure 3 below, the northern part of the Site falls within Flood Zone 2 as defined by the Environment Agency, whilst the western extremity of the Site is within Flood Zone 3. The remainder of the Site is within Flood Zone 1.

The Site is accessed by Broadford Park, which crosses common land owned by GBC, and joins with the A248 (Broadford Road) that links the villages of Shalford and Peasmarsh.

Immediately to the west of the Site is the River Wey, which is designated as the Wey and Godalming Navigations Conservation Area. Beyond the river navigation is an open flood plain that is also part of the AGLV as well as is a Site of Special Scientific Interest (SSSI).

To the east is an area of common land, which comprises areas of open grassland and woodland. This area is a designated as a Site of Nature Conservation Importance (SNCI).

Planning History

The Site has limited planning history and has not been subject to any previous planning applications for redevelopment that might be relevant to informing the proposals going forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [BBP-1 Reg 19 Reps.pdf (1.1 MB)]

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7987</th>
<th>Respondent: 15693153 / Zurich Assurance Ltd</th>
<th>Agent: Barton Willmore LLP (Sinéad Morrissey)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A34</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
</tr>
</tbody>
</table>

The Proposed Submission GBLP is accompanied by a comprehensive set of "Site Policies" that are designed to allocate land for a range of uses to support the vision, aims and objectives of the Local Plan. These policies consider sites within the whole of the borough, and allocate land for development including for housing, employment, retail and infrastructure.

Each policy lists uses that are acceptable on the identified land, alongside specific requirements and opportunities for future development proposals. Allocated sites are encouraged to progress development proposals as soon as possible, to help provide housing in the earlier stages of the plan period, to help boost housing supply. Equally, where allocated sites have been identified as likely to deliver in the later years of the plan period due to constraints, if these are resolved sooner, development proposals are encouraged.

The proposed site allocation for Broadford Business Park is set out at Policy A34 of the Proposed Submission GBLP. The Site Policy specifies the allocation, requirements and opportunities set out in Table 3 below that are to be taken into account as part of future proposals for the Site.
The supporting text that accompanies the Site Policy goes on to identify the ‘Key Considerations’ relevant to proposals for the Site. These give due consideration to the relevant planning policy designations that are summarised in Section 2 of these representations.

Zurich wholly supports GBC’s decision to allocate their land at Broadford Business Park for residential development. Zurich is committed to ensuring the optimal amount of new homes are delivered on the Site as early as possible within the plan period.

As explained in Section 2 of these representations, the Site is wholly within the single freehold ownership of Zurich. The majority of the Site will be available for redevelopment by 2019 through vacant procession, with Bishopsgate House later in the plan period. The Site is therefore available for development in the short to medium term and can provide a meaningful contribution to the borough’s housing needs in the short term.

**Site Allocation Boundary**

Zurich have noted that the access road (Broadford Park) that links the Site to the public highway (A248 – Broadford Road) has not been included in the proposed site allocation. Broadford Park is tarmacked private road that crosses common land owned by GBC (see Figure 6 below).

Zurich have a well-established easement agreement with GBC that provides a right of access over this land for users of the Site. It is anticipated that Broadford Park will continue to serve as the principle vehicular access to the Site. However, vehicular access would be possible from the north-west corner of the Site directly onto Broadford Road, if required. As such, Zurich considers this should be reflected in the Site Policy for the Site. Zurich therefore requests that GBC amend the site allocation boundary so to include Broadford Park and, for the sake of clarity, specify within Policy A34 that the land is only to be used to provide vehicular access to the Site. Furthermore, please note the change in site boundary at the corner adjacent to Broadford Cottages to reflect ownership. Further Figure 7 illustrates the suggested revised site allocation boundary.

**Land Availability Assessment**

In weighing up the decision whether to allocate the Site under Policy A34, GBC have had regard to the analysis contained in the LAA. Whilst the LAA is not an expression of planning policy and does not grant planning permission for new development, it does provide an evidential baseline that highlights prospective constraints and indicative capacity of any given site.

Consistent with the deliverability tests described at footnote 112 to paragraph 47 of the NPPF, LAA site reference 2186 considers the suitability, availability and achievability of new development on the Site.

In response to the analysis provided by site reference 2186, these representations are supported by a comprehensive suite of technical documents, prepared by an expert consultant team, to demonstrate that the Site is free from constraint and meets deliverability tests referred to in paragraph 47 of the NPPF. Through the detailed work undertaken, it has been possible to demonstrate that the Site is sustainable and can be well integrated into an existing and enhanced infrastructure network.

Set out below is a summary of the indicative development proposals for the Site along with the key findings of the technical documents prepared in response to the analysis contained in the LAA.

**Development Proposals**

A Design Statement with concept masterplan (Doc Ref: BBP-2) has been prepared by JTP architects to illustrate Zurich’s proposal for its allocation. The proposals would deliver up to 100 new homes in a range of sizes and tenures that will be tailored to meet local housing needs.

Based on a detailed analysis of the Site’s Constraints and Opportunities, page 8 of the statement presents an illustrative vision of how the Site could be developed. Development is envisaged as a range of short terraced homes, some detached and semi-detached dwellings and clusters of apartments. A prospective site layout has been prepared that offer an indication on how the Site could come forward for development. The housing mix, as summarised in Table 4 below, has been adjusted to achieve an appropriate balance between meeting local housing needs, as described in GBC’s SHMA.
whilst maintaining the character and appearance of the area. Ultimately, the final housing mix for the Site would be determined at the planning application stage in response to housing needs at that time.

The site area of the proposed site allocation is 1.5 hectares. This results in an overall development density of 66 dwellings per hectare (dph).

The layout provides a high degree of pedestrian permeability between the proposed development and the existing community, as well as making better use of the existing green and blue infrastructure, particularly in terms of improving access to the River Wey and maintaining a respectful relationship with the open countryside to the west. New landscaping across the Site will also increase opportunities to improve the biodiversity value of the Site and integrate more effectively with the SNCI and SSSI areas to the east and west.

Consistent with the objectives of Policy H2 of the Proposed Submission GBLP, the proposals for the Site will ensure affordable homes are delivered in line with GBC’s policies. Further discussions will be conducted with GBC’s Housing Team to finalise the particulars of the affordable housing products and that the proposed is reflective of local housing needs.

The Site is within easy reach of a wide range of areas of public open space, including the River Wey Navigation and Shalford village green. Opportunities to provide contributions to enhance these areas of open space will be secured as part of redevelopment of the Site. A landscape buffer will be provided along the western site boundary for the benefit of future residents so to improve access to the River Wey and provide flood risk mitigation.

**Technical Evidence to Support Allocation**

As set out in Section 1 of these representations, a suite of technical assessments have been undertaken to address the key planning considerations relevant to the Site. Whilst additional technical studies will be required for any planning application to redevelop the Site, the following address the key issues relevant to the plan making process.

**Commercial Agents Report (BBP-3)**

A commercial agents report (and associated financial appraisals) has been prepared by Savills to support these representations. The report considers the following:

- Whether the existing buildings are suitable for refurbishment or whether they have reached the end of their economic life.
- Whether redevelopment of the site for employment use is economically viable.
- Whether there is a need for this current space within the Borough for employment purposes or whether there are better suited locations.

The report advises that the existing buildings are failing and the considerable cost of their refurbishment is not a viable option for a developer. It also confirms that alternate employment uses on the site as part of a redevelopment proposal would also be unviable and, in any event, the site is not best placed for such a use in terms of location or demand. Its concluding remark is: “refurbishment of the existing office stock or the redevelopment of the site with a new office scheme will not offer a viable proposition for developers or investors. If the Property were to be brought to the market in its current form we are of the opinion that demand will be from residential developers.”

**Flood Risk Advice Letter (BBP-4)**

A Flood Risk Advice letter has been prepared by WSP to accompany these representations. It provides a brief assessment of the baseline assessment of flood risk, climate change and drainage and concludes as follows:

“In summary, the site is located in Flood Zone 1, 2 and 3, but mainly Flood Zone 2 Residential development should be preferentially located in Flood Zone 1, followed by Flood Zones 2 and 3, as discussed in Sequential and Exception Tests. To allow for climate change, a basic assessment assumes the 1 in 100 plus climate change level to be 34.80m AOD. It is recommended that further discussions with the Environment Agency are undertaken to agree an approach for estimating the climate change level.
As shown by the GBC SFRA’s the site is sequentially appropriate for development as although there are preferential site outside the flood plain the required allocation for development cannot be met in these areas and that - “The LAA and sequential test identifies that there is no reasonably available site appropriate for the proposed development of 100 homes with a lower probability of flooding.”

Based on the current information available and the above assessment, and on the understanding that residential development is located above a level 34.80m AOD including suitable mitigation and management measures are utilised it is concluded that the proposed development is considered appropriate from the perspectives of flood risk.”

Transport Note (BBP-5)

A Transport Note prepared by TTP accompanies these representations which provides an overview of the site’s location, its accessibility and the change in traffic flows that might be expected.

It concludes that:

- The site is located within walking distance of wider facilities offered in the village, local amenities and public transport.
- Bus stops providing access to a number of routes are located within walking distance from the site and Shalford train station provides regular services to London and Reading.
- The level of traffic likely to be generated by a residential use will be comparable with the existing levels of daily activity and as such would not be expected to have a noticeable impact on the operation of the public highway.

Landscape and Visual Commentary (BBP-6)

The landscape and visual commentary provided by Scarp seeks to:

- Outline landscape and visual appraisal of the site and its surroundings,
- Guide the preparation of the master plan for the proposed residential development, and
- Provide a commentary on the effects of the preliminary development proposals on the local landscape and on existing views and visual amenity.

It advises that:

- The development proposal would have many positive effects on local landscape character and visual amenity.
- The proposed development would also introduce an architectural style and materials with a stronger sense of local distinctiveness.
- The existing green corridor alongside the river would be widened and enhanced in landscape and ecological terms.
- Green belt openness would be enhanced by an overall reduction in building heights and volume and by the reduction in the amount of hard-standing on the site.
- The development proposals would enhance the rural setting of the Wey floodplain.
- The widening of the green corridor alongside the river would allow for enhanced footpath access to the River Wey, creating a recreational route that would be safer and more inviting in terms of fewer blind-spots and less dominated by large-scale built form.
- The proposed set-back of buildings away further from the Wey and Godalming Navigations Conservation Area and the establishment of a wider, more robust tree/shrub framework would enhance the setting of the conservation area.
- The enhanced enclosure of built form on the site, as recommended by the Guildford Landscape Character Assessment and Guidance, would help conserve and enhance the pastoral character of the floodplain and the rural character of views from the River Wey.

**Phasing within Plan Period**

The majority of the site will be available for redevelopment in 2019 following vacant possession. Subject to planning, it is envisages that units could be delivered on the site 2/3 years later therefore a delivery timetable of circa 5-10 years in line
with GBC LAA 2016. The redevelopment of Bishopsgate House will be later in the plan period, circa 10-15 year delivery period.

**Delivering Sustainable Development**

The NPPF states that the purpose of planning is to help achieve sustainable development. Paragraph 7 states that there are three dimensions to sustainable development, comprising economic, social and environmental roles.

Paragraph 8 emphasises the need for the planning system to balance these different dimensions.

The fundamental precept of the NPPF is a presumption in favour of sustainable development and Paragraph 14 states that this should be seen as a golden thread running through both plan-making and decision-taking.

In the Table 5 below, we summarise how the proposals for Broadford Business Park comply with the definition of Sustainable Development as described in the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- BBP-4 Flood Risk Advice Letter.pdf (760 KB)
- BBP-2 Design Statement.pdf (1.8 MB)
- BBP-5 Landscape and Visual Commentary.pdf (4.6 MB)
- BBP - 3 Commercial Agents Report.pdf (1.2 MB)
- BBP-1 Reg 19 Reps.pdf (1.7 MB)
- BBP-6 Transport Note.pdf (202 KB)
- 160718 FINAL Rep Form.pdf (534 KB)

**Comment ID:** PSLPS16/7988  **Respondent:** 15693153 / Zurich Assurance Ltd  **Agent:** Barton Willmore LLP (Sinéad Morrissey)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**SUMMARY AND CONCLUSIONS**

In summary, Zurich’s overall conclusions in responding to the Proposed Submission GBLP consultation are as follows:

1. Zurich supports GBC’s proposal to meet OAN in full;
2. Zurich is wholly supportive of GBC’s proposals to allocate land at Broadford Business Park for residential development purposes in accordance with the redevelopment of PDL in the Green Belt set out by the NPPF;
3. Broadford Business Park meets the deliverability tests set out in paragraph 47 of the NPPF;
4. The Site is within the single freehold ownership of Zurich meaning it is immediately available for development;
5. GBC should give further consideration to the inclusion of viability considerations when assessing the provision of affordable housing and planning obligations on new development sites;
6. The Site is sustainably located for future housing growth, being able to deliver a meaningful level of new and affordable housing;
7. Zurich is supportive of GBC’s economic development objectives and the removal of the strategic employment site designation from the Site. GBC’s economic development objectives will deliver a range of employment opportunities in line with GBC development strategy.

Zurich is committed to collaborative working with GBC, its partners, key stakeholders and the local community to ensure the future development of Broadford Business Park comes forward in a timely manner and in the early part of the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BBP-1 Reg 19 Reps.pdf (1.7 MB)

Comment ID: PSLPS16/7989  Respondent: 15693153 / Zurich Assurance Ltd  Agent: Barton Willmore LLP (Sinéad Morrissey)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flood Risk Advice Letter (BBP-4)

A Flood Risk Advice letter has been prepared by WSP to accompany these representations. It provides a brief assessment of the baseline assessment of flood risk, climate change and drainage and concludes as follows:

“In summary, the site is located in Flood Zone 1, 2 and 3, but mainly Flood Zone 2 Residential development should be preferentially located in Flood Zone 1, followed by Flood Zones 2 and 3, as discussed in Sequential and Exception Tests. To allow for climate change, a basic assessment assumes the 1 in 100 plus climate change level to be 34.80m AOD. It is recommended that further discussions with the Environment Agency are undertaken to agree an approach for estimating the climate change level.

As shown by the GBC SFRA’s the site is sequentially appropriate for development as although there are preferential site outside the flood plain the required allocation for development cannot be met in these areas and that - ‘The LAA and sequential test Based on the current information available and the above assessment, and on the understanding that residential development is located above a level 34.80m AOD including suitable mitigation and management measures are utilised it is concluded that the proposed development is considered appropriate from the perspectives of flood risk.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BBP-4 Flood Risk Advice Letter..pdf (760 KB)  BBP-1 Reg 19 Reps.pdf (1.7 MB)

Comment ID: PSLPS16/8320  Respondent: 15693153 / Zurich Assurance Ltd  Agent: Barton Willmore LLP (Sinéad Morrissey)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34
Transport Note (BBP-5)

A Transport Note prepared by TTP accompanies these representations which provide an overview of the site's location, its accessibility and the change in traffic flows that might be expected.

It concludes that:

- The site is located within walking distance of wider facilities offered in the village, local amenities and public transport.
- Bus stops providing access to a number of routes are located within walking distance from the site and Shalford train station provides regular services to London and Reading.
- The level of traffic likely to be generated by a residential use will be comparable with the existing levels of daily activity and as such would not be expected to have a noticeable impact on the operation of the public highway.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- BBP1_Reg_19_Reps-1.pdf (736 KB)  
- BBP6_Transport_Note.pdf (202 KB)

Zurich supports GBC’s intent within Policy E1 to deliver 3,200 additional B Class jobs by 2033 and to utilise sustainable employment development patterns to achieve this.

Seventeen designated sites make up the borough’s core supply of employment land and have been allocated as Strategic Employment Sites. Broadford Business Park has historically been allocated as a strategic employment site. However, as has been evidenced in the Commercial Agents Report that accompanies these representations (refer to Section 11 for more detail) the location of the Site combined with the substantial refurbishment costs makes the retaining the current designation unviable in the medium to long term.

GBC’s strategy has identified a varied supply and range of sites situated across the borough, which are tailored to meet local employment needs and retain a diverse local economy. Focusing economic growth on sustainably located sites that are in easy reach of public transport will also help achieve its strategic objective in reducing borough resident’s reliance on travel by private car.
Policy E3 seeks to “sustain and enhance” employment capacity (land, floorspace and jobs) in the Borough. It advises that employment floorspace will be protected across the Borough, particularly on the Strategic Employment Sites and Locally Significant Employment Sites, unless marketing evidence (varying levels of detail dependent on the site’s employment status) is provided to justify its loss.

Zurich supports GBC’s intent within Policy E3 however considers that the policy is too rigid and should be more flexibly worded to allow for other forms of evidence (such as: viability, building/structural survey evidence, local market assessment and employment land study) to justify the loss of employment floorspace. Each proposal should be considered on a site by site basis.

Furthermore, sites that are in an existing employment use, but allocated within the emerging Local Plan for an alternative use (such as Broadford Business Park), should not be protected by this policy and subject to the marketing requirement, as the site allocation confirms the acceptability of the site for the alternative use. The policy wording should be changed to reflect this.

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Paragraph 4.2.1 that precedes Policy H1 seeks to ensure GBC meets the housing needs of its Borough, accommodating families, older people, people with disabilities, travellers and students.

**Housing Mix**

With regard to housing mix Policy H1 requires development to “…deliver a wide choice of homes and meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment”. The extract from GBC’s SHMA reproduced in Figure 4 below highlights the preferred housing mix appropriate to the housing needs in Guildford Borough.

Applying the 40% affordable housing target set out in Policy H2, discussed in more detail below, Zurich notes that the arithmetic in the above table is incorrect. Zurich therefore recommends GBC reviews the content of the SHMA and clarifies the policy requirement going forward. Table 2 offer an alternative approach assuming the proportion between market and affordable housing and associated dwelling mix remains unchanged.

Notwithstanding the above, Zurich supports the recognition contained in Policy H1 that “new development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location”. Zurich is committed through their future proposals for Broadford Business Park to delivering a full mix of new homes. The precise mix will be agreed in liaison with GBC Officers and taking account of market condition at the time the Site is brought forward for development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  [BBP-1 Reg 19 Reps.pdf](#) (1.6 MB)

**Comment ID:** PSLPP16/17675  **Respondent:** 15693153 / Zurich Assurance Ltd  **Agent:** Barton Willmore LLP (Sinéad Morrissey)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

GBC is seeking to ensure, through Policy H2, that on sites providing 5 or more homes, or sites of 0.17 hectares or more regardless of the number of homes, at least 40% of new homes on these sites must be affordable. This is a blanket requirement across all qualifying sites, apart from public sector owned land, which will need to comprise solely affordable housing.

The SHMA identifies that the affordability of housing within the Borough is a key issue and recommends that a tenure split of 29% shared ownership and 71% social/affordable rent is applied when securing affordable housing provision in new developments. Policy H2 requires a minimum of 70% to be social/affordable rent, with the remainder being other forms of affordable housing.

However, unlike the Regulation 18 version of the Draft GBLP, reference to viability considerations has been deleted from the policy. Reference is instead now made at paragraphs 4.2.38 to 4.2.44 to the role of viability. This is insufficient in our view and fails to recognise the important role viability considerations have to play in the plan-making and decision-taking process.

Policy 173 of the NPPF makes clear that viability is a vital consideration in achieving sustainable development.
“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable” (NPPF, para.173).

Whilst GBC have undertaken viability testing of the proposed affordable housing policy requirement, the NPPF and PPG is clear on the need to recognise viability as a valid planning consideration that should be reflected in policy.

“…The National Planning Policy Framework policy on viability applies also to decision-taking. Decision-taking on individual schemes does not normally require an assessment of viability. However viability can be important where planning obligations or other costs are being introduced. In these cases decisions must be underpinned by an understanding of viability, ensuring realistic decisions are made to support development and promote economic growth. Where the viability of a development is in question, local planning authorities should look to be flexible in applying policy requirements wherever possible” (PPG, Ref ID: 10-001-20140306) (Barton Willmore emphasis).

The policy is also silent on the provision of Starter Homes and does not account for the impact this may have on development viability. Policy H2 should therefore clarify GBC’s planning policy position to Starter Homes and ensure this is reflected in its viability testing.

In summary, whilst Zurich is generally supportive of the delivery of affordable housing as proposed by Policy H2, they object to the specific wording of the policy. Zurich therefore invites GBC to reconsider its approach to affordable housing and ensure the wording of Policy H2 is unambiguous and retains sufficient flexibility in relation to viability considerations so to avoid the stagnation of residential and mixed use development sites in times of economic downturn. Suggested wording is set out below:

“…Subject to viability, these affordable homes will be provided:

• on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes. At least 40 per cent of the homes on these sites must be affordable homes; and
• on developments providing solely affordable housing either on public sector-owned land or developments by registered providers…”

Policy H2 also states that “developers will be expected to provide land for affordable homes at nil value”. The Local Plan Viability and Affordable Housing Study (December 2014) prepared by Peter Brett Associates has not tested the viability implications of applying a nil land value to affordable housing. In view of the high land values throughout the borough, Zurich objects to the current wording and would request that GBC alter their approach so to retain flexibility. As an alternative, whilst the policy may aim for a nil land value, in some circumstances this may not be appropriate and may in fact stifle development. Zurich therefore requests that GBC revisit their approach and retain sufficient flexibility to ensure development proposals are not rendered unviable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  BBP-1 Reg 19 Reps.pdf (1.6 MB)
Policy II seeks to ensure that “…infrastructure needed arising from a proposed development is provided and available when first needed to serve the occupants and users of the development”. The redevelopment of Broadford Business Park will secure funding for infrastructure improvements through GBC’s Community Infrastructure Levy (CIL) and other site specific planning obligations. The infrastructure derived from CIL in particular will enable GBC to deliver the key infrastructure identified in Appendix C of the Proposed Submission GBLP. Zurich supports this approach and will work with key infrastructure agencies, including Surrey County Council Highways and Education departments, to deliver the site specific mitigation measures in a timely manner.

Zurich notes that reference to viability considerations when negotiating planning obligations has been removed since the Regulation 18 Draft GBLP was consulted upon. In accordance with paragraph 173 of the NPPF, Zurich recommends amendments that reference to viability considerations is reinstated except where the non-delivery of effected infrastructure would result in unresolved planning harm that is not outweighed by other material planning considerations. Revised wording for Policy II is set out below:

“To support delivery of this Local Plan, infrastructure needed to support development should be provided and available when first needed to serve the occupants and users of the development. This will be secured by planning obligation, planning condition, or from other infrastructure funding, including the Community Infrastructure Levy. Where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused, unless evidence is provided to demonstrate that the delivery of such infrastructure would render the development proposal unviable and does not result in unresolved planning harm that is not outweighed by other material considerations”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17676  Respondent: 15693153 / Zurich Assurance Ltd  Agent: Barton Willmore LLP (Sinéad Morrissey)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Policy P2 sets out GBC’s continued commitment to protecting the Metropolitan Green Belt against inappropriate development by using criteria set out within the NPPF. Zurich supports the objective that new development in the Green Belt will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.

The policy confirms that proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, the specific criteria set out in the policy.
There are insufficient opportunities for growth within both Guildford’s urban area and settlement areas within the Borough. This results in the need for GBC to release appropriate Green Belt sites in sustainable locations. Broadford Business Park is PDL and therefore complies with the sixth exception criteria set out in paragraph 89 of the NPPF. The redevelopment of the Site is not therefore inappropriate in the context of Green Belt policy but will remain ‘washed over’ by Green Belt throughout the plan period.

Paragraph 4.3.18 of the Proposed Submission GBLP notes that the redevelopment of previously developed land where it would not have a greater impact on the openness of the Green Belt is an exception to new buildings being deemed inappropriate in the Green Belt (emphasis added). In December 2015, the department for Communities and Local Government conducted a ‘Consultation on proposed changes to national planning policy’. In accordance with the Government’s desire to utilise brownfield sites, contribute towards the delivery of Starter Homes and to add flexibility to the existing policy situation, paragraph 53 of the consultation document outlined that the redevelopment of brownfield land in the Green Belt need not be inappropriate unless any harm to the openness of the Green Belt was ‘substantial’.

Whilst Zurich recognises that the position and relationship of the Site relative to the Shalford settlement boundary, combined with the non-strategic nature of the proposed allocation, is not sufficient to warrant the Site’s release from the Green Belt, Policy P2 should remain sufficiently flexible to account for future changes in national planning policy. The policy wording itself achieves this. We, however, consider the wording of paragraph 4.3.18 requires amendment to account for future changes in national planning policy. The following wording is therefore suggested:

“Whilst most forms of development are considered inappropriate in the Green Belt, national planning policy lists certain exceptions which are not inappropriate. These are set out in paragraphs 89 and 90 of the National Planning Policy Framework. The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land where it would not have a greater subject to the impact on the openness of the Green Belt, as set out by national planning policy”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BBP-1 Reg 19 Reps.pdf (1.6 MB)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17673  Respondent: 15693153 / Zurich Assurance Ltd  Agent: Barton Willmore LLP (Sinéad Morrissey)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing

Paragraphs 4.1.5 to 4.1.14 of the Proposed Submission GBLP set out GBC’s spatial development strategy, identifying the scale and distribution of development. They support Policy S2, GBC’s Borough Wide Strategy, which identifies an overall housing requirement throughout the plan period of 13,860 new homes between 2013 and 2033. This equates to 693 dwellings per annum when spread across the 20 year plan period.

It is important to note that the proposed housing target has been set before any unmet needs arising from neighbouring authorities, and that which is expected to arise as a result of the Further Alterations to the London Plan adopted in March 2015 and any subsequent full review of the London Plan to emerge prior to adoption of the GBLP, have been taken into account. On this basis, Zurich notes that GBC will need to ensure that the strategy is justified by up to date evidence, and that appropriate cooperation has taken place with other surrounding planning authorities.

Overall, Zurich is generally supportive of GBC’s intent to ‘boost significantly’ its supply of housing in line with national policy objectives (para. 47, the NPPF), which provides the “exceptional circumstances” necessary to justify undertaking a review of Green Belt boundaries. Zurich welcomes GBC’s efforts to produce a plan that is ‘positively prepared’ in accordance with paragraph 182 of the NPPF by uplifting the borough’s overall housing target, compared to earlier iterations of the plan, so to be commensurate with the full objectively assessed need (OAN) figure of 693 dpa identified in the West Surrey Strategic Housing Market Assessment (SHMA, October 2015). As the GBLP moves forward towards Examination, GBC should ensure that it keeps its evidence base under review and account for the latest population projections released by the Office for National Statistics and current market conditions.

Policy S2 should, however, make clear that the proposed housing target is to be treated as a minimum that GBC should seek to exceed. The following amendments are therefore recommended to Policy S2:

“During the plan period (2013-33), we will make provision for a minimum of 13,860 new homes, 37,200 – 47,200 sq m of office and research and development (B1a and b) floorspace and 4.7 – 5.3 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs.

The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The minimum housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision…”
In order to support economic growth and tackle the acute affordability issues that affect the three authorities that make up the South West Surrey Housing Market Area (HMA), Zurich consider it vitally important to bring forward new housing quickly and meet OAN in full. To this end, Zurich also supports the recognition that the development of Broadford Business Park will make a notable contribution towards meeting the Borough’s strategy.

**Safeguarded Land**

Unlike the Draft GBLP subject to the previous Regulation 18 consultation, GBC has removed the flexibility previously incorporated into Policy S2 through the inclusion of 99 hectares of safeguarded land to be used for various purposes, including residential. Instead, as discussed in more detail below, GBC’s planned housing delivery has relied upon identifying a greater amount of capacity than that required to meet housing need in full.

Paragraph 85 of the NPPF makes clear that when defining Green Belt boundaries, “…where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period…”. Zurich therefore recommends that GBC seek to identify additional safeguarded land on a site specific basis now so to ease transition into subsequent versions of the Local Plan and avoid generating a backlog of housing delivery similar to what currently exists in the borough.

**Employment**

Informed by GBC’s Employment Land Needs Assessment (September 2015), Policy S2 specifies that 37,200 – 47,200 sqm of office and research and development (B1a and b) floorspace and 4.7 – 5.3 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs.

Zurich is generally supportive of the delivery of new, good quality employment floorspace in the Borough but considers it essential for any such accommodation to be appropriately located so to meet the needs of local communities and benefit from sustainable transport connections so to minimise traffic generation.

**Policy S2: Annual Housing Target**

Policy S2 anticipates that housing delivery will vary across the plan period. As a result, the annualised housing target gradually increases from 500 dwellings per annual (dpa) in 2018/19 to 790 dpa in 2032/33 so to reflect GBC’s envisaged housing trajectory. The proposed annual housing equates to a total of 10,395 dwellings between 2018 and 2033. This therefore means GBC need to have delivered 3,465 dwellings, at a rate of 866 dpa, in the initial part of the plan period between 2013 and 2017 in order to meet GBC’s overall housing target.

GBC’s most recent Monitoring Report (October, 2015) covering the period 2014/15 (replicated in Table 1 below) notes the performance in terms of net housing completions between 2006/07 and 2014/15.

Recent trends in GBC would suggest that accommodating backlog housing need equivalent to 866 dpa is not achievable in the short term without the necessary improvements to supporting infrastructure. Zurich would therefore invite GBC to reconsider its future housing trajectory and ensure that sustainable growth, commensurate with the rate new infrastructure is brought forward, is incorporated into the medium to later stages of the plan. By the same token, opportunities for GBC to bring forward smaller sites that place a less substantial burden on existing infrastructure should be embraced.

**Table 1 – Planning Delivery between 2018 and 2033**

Paragraph 4.1.12 explains that GBC will deliver the development identified at Table 1 throughout the plan period. The number of homes identified at Table 1 exceeds the housing requirement set out at Policy S2. GBC’s rationale for this is to “…build flexibility into the Plan and demonstrate that our strategy is capable of delivering the target”. GBC has adopted a mixed approach to its spatial distribution with the Proposed Submission GBLP including a range of prospective sites that vary in size and can be delivered at different stages throughout the plan period. Zurich supports this approach and considers it offers the most robust solution to ensure GBC is able to still deliver its vision in the event sites were not to come forward as planned.

Zurich therefore supports the inclusion of Table 1 within the Proposed Submission GBLP where it fulfils NPPF objectives set out at paragraph 47 by “…identifying key sites which are critical to the delivery of the housing strategy over the plan...
period”. Given the important role Table 1 plays in identifying realistic future growth locations which are critical to meeting GBC’s identified housing need, Zurich recommends the inclusion of Table 1 within Policy S2 rather than as supporting text.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [BBP-1 Reg 19 Reps.pdf (1.6 MB)]

---

**Comment ID:** PSLPP16/17670  **Respondent:** 15693153 / Zurich Assurance Ltd  **Agent:** Barton Willmore LLP (Sinéad Morrissey)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**REPRESENTATIONS TO GBC’S VISION AND AMBITION**

GBC set out at Section 3 of the Proposed Submission GBLP, the Vision and Ambition for Guildford Borough. The key points can be summarised as follows:

- Meet the identified growth needs of the borough in terms of housing, employment, retail and leisure;
- Provide the delivery of 13,860 additional homes, in a range of sizes and preferably on brownfield sites, by 2033 to reflect local needs and create mixed communities;
- Affordable housing will account for approximately 40% of all new housing and provided on all appropriate sites;
- Maintain the extent and function of the Green Belt so to protect the existing character of the borough and a clear distinction between urban and rural areas as well as the natural, built and historic environment;
- Over 2,800 units are proposed in the urban areas and will take advantage of existing infrastructure and services as well as sustainable transport options;
- Due to it not being possible to meet all the borough’s development needs within Guildford’s urban areas, the plan proposes to deliver additional housing on sustainable locations within and around existing villages and as large strategic extensions to Guildford’s urban area and as a new settlement created at Wisley that will bring forward significant infrastructure;
- Provide a significant increase in accessible public open space across the borough;
- Maintain and support existing high levels of economic prosperity through the protection of commercial premises and the provision of additional sites to meet the needs of businesses across the borough;
- Support the rural economy;
- Maintain and enhance Guildford town centre as the largest retail, service, administrative and commercial centre in Surrey; and
- The growth proposed is predicated on the delivery of the necessary improvements to infrastructure, including new rail stations, park and ride facilities and major improvements to the A3 and A3/M25 interchange, as outlined in the Infrastructure Schedule that supports the plan as well as encourage the use of alternative modes of transport.

Zurich supports the objectives of GBC, coming forward within their Vision and Ambition, particularly where this seeks to provide new homes to meet the needs of its communities.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [BBP-1 Reg 19 Reps.pdf](#) (1.1 MB)

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4314</th>
<th>Respondent: 15693185 / Susan Wade</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I believe that the number proposed for housing is over-stated as it is based on flawed evidence for expansion. This is supported clearly by the Guildford Residents Association report on housing. Expansion should be constrained to protect the character and attractiveness that Guildford currently offers.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17668</th>
<th>Respondent: 15693185 / Susan Wade</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The centre of town does not need 40% more retail units. It should be developed to offer more homes so badly needed by both young and old. This combined with leisure offerings would bring life to the centre whilst at the same time contributing to the housing requirements.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17669</th>
<th>Respondent: 15693185 / Susan Wade</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/17667</td>
<td>Respondent: 15693185 / Susan Wade</td>
<td>Agent:</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The transport infrastructure, both in the town but in particular along the A3 corridor are not fit to support the proposed level of housing needs and consequently the extra traffic. Major issues such as a central bus facility close to the railway station have also not been resolved. Without improvements to support growth Guildford will become grid-locked.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: SQLP16/2020 | Respondent: 15693185 / Susan Wade | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt Development should not be allowed except in truly exceptional cases in an AONB. Use of Brown Field Sites should be maximised

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I support both responses submitted from the Downsedge Residents Association and Guildford Residents Association and similarly do not feel that this plan is ready for an inspector

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/4318  Respondent: 15693313 / Nigel Richardson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Being a frequent resident visitor to East Horsley and residing with the below Ralph and Charlotte Harris I wish to add my objection to the current proposal.

It is clearly not in the interests of the local community to adopt the Council proposals and the Inspector should take full notice of what objections are being made with which I fully concur.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7991  Respondent: 15694113 / Claire Netherton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In looking at what residents can do to object, it considers that it would be best for residents to focus on objecting to the inclusion of development of the Former Wisley Airfield and it has drafted some bullet points for residents to use as below.

It is important to state an objection whenever that is appropriate.

Object to the removal of the Former Wisley Airfield from the Green Belt. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford.

The increased traffic would cause congestion and danger on the narrow rural roads in Ockham, Hatchford, Downside and Cobham. Cobham is the closest shopping centre to the proposed development. The village could not cope with the additional traffic and car parking involved in serving some 5,000 additional occupiers at the site and would experience a significant increase in stationary/idling traffic at peak times and at junctions.

Any proposed secondary schooling would add additional congestion.

Objections are supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17687</th>
<th>Respondent: 15694113 / Claire Netherton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Object to the threat the Local Plan as drafted poses to the historic rural settlements of Ockham, Hatchford and Downside.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17688</th>
<th>Respondent: 15694113 / Claire Netherton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Object to the issue of air quality not being taken seriously. Air pollution in this area in the north of the Borough of Guildford and the south of the Borough of Elmbridge and particularly near the M25/A3 junction already exceeds EU-permitted levels. Additional traffic would worsen the situation, affecting the health of all current and future residents.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17689</th>
<th>Respondent: 15694113 / Claire Netherton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The area is a haven for wildlife, some of which is already endangered. The introduction of residences would mean the import into an ecologically sensitive area not only of humans and their increased footfall, but also of pets, and cats and dogs in particular, that can have a devastating effect on wildlife. Protected species on and near the site and wildlife corridors would be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/17685  Respondent: 15694113 / Claire Netherton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our planning team have been considering the draft Guildford Local Plan since it went out for consultation last month. It will be responding by making many points, on the basis for housing figures, Green Belt and the environment in particular.

No exceptional circumstances have been established to warrant removing the site from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17690  Respondent: 15694113 / Claire Netherton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object to insufficient consideration being given to the environmental and ecological value of the site and the area around it, taking account of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNIC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4325  Respondent: 15694465 / Ellie Denham  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Village sites - East and West Horsley

I object to the extension of the settlement boundary of my village (East and West Horsley) by the redrawn insetting boundary. I particularly object to the inclusion of Kingston Meadows, land owned by GBC and previously dedicated as open space for the use and benefit of the community. That is a key green space and recreational area where I have used the play parks, bike humps, trim trail and football pitch for decades with friends from the village and outside. It is used by hundreds of dog walkers and for village celebrations. No change to the settlement boundary has been justified. I object to the inclusion in the Plan of six large housing sites in the Green Belt by the two villages (A36 - 41).

In addition I draw your attention to the very serious existing problems in the village with infrastructure - roads, flooding and drainage, sewage, etc - and facilities - schools, doctors, transport, parking at the station to mention just a few. There is a high dependence on car use. For these reasons a large increase in housing is not feasible. For all the reasons given above, any additions to housing in East and West Horsley should be small scale and preserve the openness of these Green Belt villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7992  Respondent: 15694465 / Ellie Denham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New Settlement at Ockham

I strongly object to the proposal to use farm and previously requisitioned land at Ockham for 2,100 houses. This is important Green Belt Land. The impact on my village would be enormous and unsustainable. Planning permission has recently been refused for numerous reasons and the site should therefore be removed from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17691  Respondent: 15694465 / Ellie Denham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt  (including Policies S1, S2, P2)

You should not take my village or any of the other villages out of the Green Belt. The Green Belt needs protection now more than ever.

The Green Belts are not ours or yours to give away, but a precious gift to be preserved for my children and their children.

Housing

I object to all policies based on your housing figures, which I believe are too high. I further object to a Plan which requires 70% of housing to be built on the Green Belt. Everything possible must be done to put as much of the housing as possible on urban brownfield land and I object to your policies which do not do this (Policies H1,H2). This will also help Guildford town centre which should be revitalised with more town centre housing than is proposed as shops shut with the move to internet shopping. (Objection to policy E7, E8).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/17707  Respondent:  15697665 / Campaign for Real Ale (Mick Bell)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Local Plan – Proposed Submission Local Plan: strategy sites 2016

I am writing on behalf of the Surrey/Hants Borders Branch of CAMRA, the Campaign for Real Ale, in relation to the above consultation.

As you would expect, CAMRA’s chief concern is that the Local Plan will afford suitable protection, in planning terms, for public houses. The continuing loss of traditional pubs, both in urban and rural settings, is in our view having a very negative effect on the communities concerned. The planning system affords a potentially powerful line of defence against the efforts of some pub owners to make short-term financial gains at the expense of valuable community facilities. Our hope would be that the Local Plan will include policies which support the retention of community assets like pubs and resist applications for change of use unless there is very clear evidence that the facility is no longer wanted or needed.

I note that the Vision contained in the plan highlights the importance of protecting and supporting community facilities. I would support this, and whilst it is implicit that such community facilities include public houses, it would help strengthen the Plan if this was made clearer.
I am also pleased to note that Policy E5, contains a specific mention of public houses in terms of businesses that will be supported for retention in rural areas. I would agree that pubs they often essential in maintaining the local economy in rural villages. However, this can equally apply in urban areas, such as for example the suburbs of Guildford, where whole communities often have a single pub to act as the focus of the community. I would therefore like to see this policy extended to cover all communities, not just rural areas.

Whilst this is positive I believe your policies in relation to the retention of pubs should be stronger and would therefore suggest that as the Local Plan develops a further policy should be included along the following lines:

That the Council strongly supports retaining public houses, particularly in rural areas where the availability of other premises is limited. Applications for changes of use will be resisted, unless convincing evidence can be provided to show that the public house is not economically viable. If permission is granted for a change of use, preference will be given to the premises remaining in some form of community or employment use; as long as there are no traffic, amenity, environmental or conservation problems as a result.

If applications for a change of use of a public house are received the Council will require evidence that:

- a comprehensive and sustained marketing campaign (agreed in advance by the Council) offering the public house for sale as a going concern, has been undertaken, using an agreed valuation of the premises;
- the marketing campaign has run for a period of at least twelve months before the planning application is submitted;
- if marketing has been based wholly or partially on an alternative community or employment use, there has been prior discussion with the Council on the principle of the proposal; and
- the public house has been offered for sale locally, and in the region, in appropriate publications.

In addition we would strongly advocate that the Council develops pub protection further within a Supplementary Planning Document (SPD). This has already been done in neighbouring Rushmoor who introduced a SPD relating to Development Affecting Public Houses and we would like you to consider the introduction of something similar in Guildford.

We believe the protection of public houses in Guildford is very important and think a SPD or similar would be helpful, by setting out to developers how they should justify any proposals for change of use, conversion or redevelopment of pub sites. In particular this could include criteria for the assessment of applications for development proposals affecting the loss of current or former public houses. CAMRA have produced a Public House Viability Test that can be used to assess the viability of pubs and help to demonstrate whether or not a particular public house is economically viable. We fully accept that in some instances a public house may well not be sustainable, but do feel that such a decision should be made following a sound assessment of need.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/18549</th>
<th>Respondent:</th>
<th>15697665 / Campaign for Real Ale (Mick Bell)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I am writing on behalf of the Surrey/Hants Borders Branch of CAMRA, the Campaign for Real Ale, in relation to the above consultation.

As you would expect, CAMRA’s chief concern is that the Local Plan will afford suitable protection, in planning terms, for public houses. The continuing loss of traditional pubs, both in urban and rural settings, is in our view having a very negative effect on the communities concerned. The planning system affords a potentially powerful line of defence against the efforts of some pub owners to make short-term financial gains at the expense of valuable community facilities. Our hope would be that the Local Plan will include policies which support the retention of community assets like pubs and resist applications for change of use unless there is very clear evidence that the facility is no longer wanted or needed.

I am also pleased to note that Policy E5, contains a specific mention of public houses in terms of businesses that will be supported for retention in rural areas. I would agree that pubs they often essential in maintaining the local economy in rural villages. However, this can equally apply in urban areas, such as for example the suburbs of Guildford, where whole communities often have a single pub to act as the focus of the community. I would therefore like to see this policy extended to cover all communities, not just rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18550  Respondent: 15697665 / Campaign for Real Ale (Mick Bell)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18548 Respondent: 15697665 / Campaign for Real Ale (Mick Bell) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note that the Vision contained in the plan highlights the importance of protecting and supporting community facilities. I would support this, and whilst it is implicit that such community facilities include public houses, it would help strengthen the Plan if this was made clearer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7999 Respondent: 15697921 / Chris Smedmore Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the late inclusion of the site A43 at Garlicks Arch. The scale of development proposed is disproportionate both to the size and character of the villages of Send and Ripley and also in respect of the borough as a whole, with far too much development focused in one area. The site is liable to flooding and not supported by adequate infrastructure to enable sustainable methods of transport, meaning new residents will have a high reliance on cars. Many of the routes between Ripley, Clandon and the surrounding areas are tiny country lanes, which are in poor condition and do not accommodate traffic in both directions at once. The main routes through Clandon, Ripley and Send are already highly congested during rush hours and at other times of the day, particularly where problems arise on the A3. The route through Clandon in particular is barely wide enough in places to allow the passing in both directions of heavy goods vehicles. I have seen no plans for additional railway stations to support sustainable travel around these developments and Highways England has no plans to improve the A3/M25 trunk roads (which are already severely strained) within the timeframes necessary to accommodate this plan.

The huge number of houses and large industrial space proposed will stretch the local villages’ amenities (utilities, doctors and schools are already close to or at capacity), cause further traffic problems on routes that are already severely strained during busy periods and harm the environment in a greenbelt area surrounded by ancient woodland, which is home to an
abundance of wildlife, including some protected species.

There has been no adequate consultation on this additional development, which was added late to the draft in May 2016.

The industrial site is an unnecessary addition to this area, where there are seemingly other sites available which are far more appropriate for this type of development, in particular around Slyfield, which is already industrialised and would not pose such a threat to protected areas and wildlife habitats.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

*Attached documents:*
Comment ID: PSLPP16/17714  Respondent: 15697921 / Chris Smedmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Consequently I object to the in-setting of any villages from the Green Belt. I have seen no evidence of the ‘exceptional circumstances’ required by National Planning Policy for removing any of these villages from the Green Belt. Government policy is clear that housing needs is not sufficient to be presented as an exceptional circumstance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17712  Respondent: 15697921 / Chris Smedmore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to place on record my wholehearted objection to the 2016 Draft Local Plan. I understand that there is some need for new housing and industrial space in the borough, however I have been unable to find evidence supporting the housing needs numbers in relation to these developments and the local villages are nowhere near equipped to deal with the size and locations of the developments proposed, which have not been well thought out and are, in my opinion unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4335  Respondent: 15698017 / Katie Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report. I have been unable to locate a copy of this and therefore do not believe the information available is conducive to a fair consultation., The 693 house per year is more than double the figure of 322 used in previous plans and again seems disproportionate and without the information available to verify the high figure, the decision lacks transparency.

I kindly ask that the above considerations are taken into account and that the Plan is revised accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8001  Respondent: 15698017 / Katie Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

- There are no exceptional circumstances which allow for the removal of this land from the Green Belt, as required by national policy. Housing need is not enough to constitute exceptional circumstances.
- The scale of the development proposed is far too large as the neighbouring villages do not have the infrastructure to support the proposed number of houses. Schools are already at or near capacity and there inadequate railway facilities or bus routes to prevent an inevitable over reliance on cars. There is no infrastructure schedule for Garlick’s Arch, so the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose
- The roads in Send, Ripley and Clandon are not sufficient to cope with additional traffic flow that would inevitably arise from a development of this size. The proposed inclusion of an industrial estate is likely to increase the use of the roads by heavy goods vehicles and the roads, which are already in poor condition are unlikely to be able to support this. The extra traffic will also have a severely detrimental impact on the environment.
- The woodland surrounding Garlick’s Arch is centuries old, includes a number of trees protected by Tree Preservation Orders and is home to many species of wildlife. Development on the scale proposed is likely to severely damage animal habitats. I have been unable to locate a wildlife report carried out on this site and it seems the severe environmental impacts of the proposed developments have not been properly considered.
- The land is also susceptible to flooding and this does not seem to have been properly taken into account, with the Environment Agencies flood risk ratings being higher than that specified by the Council.
- There has been no adequate consultation on this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8002  Respondent: 15698017 / Katie Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common will draw in a huge amount of traffic through Burnt Common, Send and Old Woking in areas where the focus should be to reduce, not increase traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17715  Respondent: 15698017 / Katie Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

The A3 and M25 are already severely strained at the junctions closest to Ripley. The scale of development in the Local plan, particularly for the sites at Garlick’s Arch and Wisley Airfield (A35) is such that there will be unprecedented increases in traffic on these routes. I have been unable to identify adequate evidence of the plans in place to address the likely impacts on key trunk roads resulting from the scale of developments proposed in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4338  Respondent: 15698209 / Stephen Salmon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Please find below my objections to the Guildford Local Plan.

West Horsley is defined by Guildford Council as a Green Belt Village.

Policies in the Governments National Planning Framework (NPPF) require that new building is regarded as inappropriate in the Green Belt.

These Policies also say that only limited infilling with Housing is appropriate .

Neither of these policies support substantial new development in the green belt.

The Councils Proposals total some 500 new dwellings in the green belt, which is clearly contrary to the above policies.

Previous objections to the Local Plan by West Horsley residents have been totally ignored by the council, who have shown no community engagement in producing the current plan with the increase in housing and the expansion of the village contrary to their wishes.

In producing the new Local Plan larger sites are proposed west of Guildford to reduce the pressure on the green belt. No benefit is evident to the residents of West Horsley from this reappraisal and in fact an increased requirement for housing in their green belt is proposed.

The existing roads, schools and health facilities have no plan for funding set out in the plan to address 500 new houses.

Several of the new sites proposed extend the built area out into the countryside, which is clearly damaging to the Green Belt where any new building is regarded as inappropriate in government policy.

The council are proposing new village boundaries which extend the built area outwards into the green belt, again clearly damaging to the Green Belt where any new building is regarded as inappropriate in government policy.

The proposed new development has been focussed on West Horsley with no Special Purpose being defined as required by policy to promote development in the green belt.

The protection of Birds in the special protection area near Wisley requires special consideration within 5 km. All of the sites in West Horsley and the site at Wisley Airfield are within this 5km. Any new development requires the possible effect on the birds to be addressed by the provision of alternative open space to draw residents away from Wisley. Effingham Common has been identified to serve this propose but in order to be usable for this purpose it requires a public car park which it has not got. Common Rights and planning permission issues may well stop this ever coming forward. This puts in doubt the feasibility of the sites in the long term.

For all of the above reasons I object to the Local Plan and request that the minister addresses the green belt points and confirms that West Horsley remains a green belt village, recognises the uncertainty relating to the protection of the birds and that as a result removes the pink coloured sites as development sites from the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of any evidence to the housing need numbers

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/8010  **Respondent:** 15698753 / Anna Calvert  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A25 Gosden Hill Farm. This is a large scale overdevelopment of the area

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/8011  **Respondent:** 15698753 / Anna Calvert  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A35 Wisley Airfield

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPS16/8007  **Respondent:** 15698753 / Anna Calvert  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the late inclusion of site A43 Garlick’s Arch and any development on it. This area is covered by ancient woodland and the site floods. Any industrial space needed is better placed at Slyfield

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8008  Respondent: 15698753 / Anna Calvert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43a and the on/off ramp at Clandon. This will inevitably increase traffic problems in the local villages and particularly Send which is already overloaded. Noise and pollution levels would worsen. This must be avoided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8009  Respondent: 15698753 / Anna Calvert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 The Talbot since this is a conservation area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17732  Respondent: 15698753 / Anna Calvert  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to all erosion of the green belt and any “in setting” (i.e. removal) of any villages from the green belt.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17733  Respondent: 15698753 / Anna Calvert  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to the local plan because the development proposed is not sustainable (policy S1)</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17735  Respondent: 15698753 / Anna Calvert  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to the disproportionate amount of development in one area of the borough</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

| Comment ID: SQLP16/2033  Respondent: 15698753 / Anna Calvert  Agent: |
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period

I object to the last minute inclusion of new sites with less than two weeks’ notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/2042  Respondent: 15698753 / Anna Calvert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the limited consultation period

I object to the last minute inclusion of new sites with less than two weeks’ notice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4344  Respondent: 15699201 / Robert Griffin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to raise my objections to the current "Guildford Local Plan" proposal.

The plans are flawed on so many levels, it is difficult to know where to begin, or where to stop when commenting on them.

Firstly, the secrecy surrounding the advice Guildford Borough Council has received with regards to the number of new houses which apparently need to build each year within the borough is scandalous. If justification for such an
important decision cannot be transparent then I have deep concerns about its reliability. Also, the fact that now the UK has voted to leave the EU, the calculations and projections must surely have altered, meaning the figures are outdated, if they were in any way accurate to begin with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17743  Respondent: 15699201 / Robert Griffin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are already too many shop and office spaces in and around Guildford (a number of which are empty or not filled to capacity) so any proposal to build more of either is senseless at this time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17740  Respondent: 15699201 / Robert Griffin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I think it is very naive to think that building houses on the green belt, will assist anyone living or working locally. Building more houses in these areas will not provide affordable housing for those who may need it, but will simply encourage more people to relocate to the Guildford area, putting further strain on the existing services, the poor and overpriced public transport system and worst of all the road network, which is already regularly at gridlock in many places with the current volume of commuter traffic.

Instead, existing sites within Guildford town should be re-developed to provide affordable housing, if it really is achievable or necessary at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17742  Respondent: 15699201 / Robert Griffin  Agent:
Any plans to pedestrianize essential routes through central Guildford, without providing replacement routes (which would be extremely challenging) are also very naive and short-sighted. The only solution to the terrible congestion and traffic problems within Guildford, are to discourage drivers, or to build a bypass. Non-essential commuter traffic passing through Guildford and its surrounding villages should be discouraged, perhaps with tolls (that should not be levied on local residents!) and with business rate incentives for companies who work within the local area and employ staff living within the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17741  Respondent: 15699201 / Robert Griffin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Many of the recent small scale alterations to Guildford's roads and the closing of pedestrian underpasses, have been very ill conceived ideas. The junction at Waitrose, the underpass at the bottom of the high street and removal of the road side pull-ins for buses on the A281 in Shalford. These all demonstrate a lack of foresight and have each ADDED to the congestion problems on Guildford,s busy roads. Such poor decisions really make me worry about the councils ability to plan, oversee and execute any large scale changes to the town and its surrounding area....
Another factor contributing to the lack of available housing within Guildford Town, are the large number of buy to let homes rented to Surrey University students. If the University of Surrey were to build the on site student accommodation it has obtained planning permission for, then all of these houses would become available for local residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/17750  **Respondent:** 15699777 / ANGLE plc (Ian Griffiths)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

ANGLE wrote to the Council during the last consultation of the Local Plan. I should like to reiterate our support for the University of Surrey/Surrey Research Park (SRP). Our support reflects the fact that we believe the University and SRP are very well placed to continue to achieve major economic impacts on the area and we are concerned that capacity constraints could have a negative impact in retaining and attracting highly skilled workers.

We support:

- Improved access to the west from the SRP - there are few negatives about working at SRP but access and traffic congestion is one of
- Future expansion of the Research Park will ensure for us and many other companies on the Park the potential for continuity as we
- Additional affordable housing would help with the development and retention of the young science graduates ANGLE needs to employ in the development of its revolutionary cancer diagnostic
- While acknowledging any changes to the green belt are contentious, the company supports the necessary planning processes and strategies to achieve these features of the proposed plan

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPA16/4354  **Respondent:** 15700353 / Edward Warren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Plan because the housing numbers have not been substantiated in a manner open to public scrutiny and appear to be deeply suspect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4353  Respondent: 15700353 / Edward Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing Send form the greenbelt because it will substantially erode the buffer between Guildford and Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4355  Respondent: 15700353 / Edward Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan is a serious threat to Send and Ripley and should be rejected.

My wife objects too. Please feel free to verify this via her email address above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8013  Respondent: 15700353 / Edward Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
I object to the Garlick’s Arch development since it will contribute to sprawl and destroy the countryside.
I object to the Garlick’s Arch development because the extra traffic cannot be accommodated on local roads. At least 1000 cars will be injected into the road system that’s already jammed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8015  Respondent: 15700353 / Edward Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Garlick’s Arch development due to the destruction of the ancient woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8017  Respondent: 15700353 / Edward Warren  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Garlick’s Arch industrial development because the figures reportedly show a reduction in the need for this kind of development and yet Garlick’s Arch was slipped into the Local Plan despite non-greenbelt land being available.
I object to the Garlick’s Arch development due to the tendency of the land to flood

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

---

**Comment ID:** PSLPS16/8014  **Respondent:** 15700353 / Edward Warren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan to install a motorway style on/off junction on the A3 at Burntcommon because no explanation given to the how the narrow A247 can carry the loads. The expansion of this road into one capable of handling the traffic would be a difficult challenge without causing notable destruction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

---

**Comment ID:** PSLPS16/8016  **Respondent:** 15700353 / Edward Warren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the on/off junction at Burntcommon since Send (and Clandon) will become alternative cut throughs when the M25 is blocked (and that happens frequently).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

---

**Comment ID:** PSLPP16/17762  **Respondent:** 15700353 / Edward Warren  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of green belt controls from the villages of Send and Ripley because there is no proper plan to deal with the increased headcount and they’ll no longer be villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17764</th>
<th>Respondent: 15700353 / Edward Warren</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plans for Wisley and Garlick’s Arch developments because no provision has been included for rail and given the overloading of the roads in the area, rail is the only type of new infrastructure that matters.

I object to the Local Plan’s malign intent for Send and Ripley because the nearest mainline station (Woking) is already overloaded and the Local Plan will only make matters worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17765</th>
<th>Respondent: 15700353 / Edward Warren</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan because not enough has been done to show that the supposed needs in the Local Plan can’t be accommodated close to the transport and service centre in Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17763</th>
<th>Respondent: 15700353 / Edward Warren</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the Local Plan because we Locals have already made it clear through the ballot box that development on the green belt and over our villages is not wanted. I have not met anybody, other than above mentioned councillors, who supports the Local Plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17766</th>
<th>Respondent: 15700353 / Edward Warren</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the building on any of the Borough’s greenbelt. It was put in place for good reason. There are no special reasons for destroying it. This in itself should be enough to reject substantial parts of the Local Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2039</th>
<th>Respondent: 15700353 / Edward Warren</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I have been following the debate on the Local Plan through the Surrey Advertiser, attendance at a Parish meeting and leaflets that have come through our letter box. No information has been received from GBC despite their promotion of the Local Plan. The Council Leader (Mr. Spooner) and his Deputy (Mr. Furniss) did attend the Send Parish meeting which was good of them. Unfortunately it did nothing to arrest local fears and concerns. The inability to name the developers that have been liaising closely with the Council and the lack of willingness to show the calculations that support the housing number added to the general stench arising from the last minute insertion of Garlick’s Arch into the Local Plan. I like to believe that corruption is something that happens elsewhere but this the Parish meeting left me uncertain. The Deputy’s belief that a motorway style junction is a good idea because it would help build a tunnel under Guildford is demented.

I understand that there is a format that has to be followed to register an objection to the Local Plan otherwise you are simply ignored. But to be clear, I utterly object to developments that contribute to urban sprawl. I’ve spent a lot of time in Houston and have observed at close hand what uninhibited building does. The idea of building on the greenbelt might bring some short term gain to a few developers but we all lose in the long term as Guildford sprawls up the A3 towards the M25. Who are we to wreak destruction on the countryside and leave concrete for those who come after us? In the short term we all lose as the overloaded rail and roads deteriorate further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2040</th>
<th>Respondent: 15700353 / Edward Warren</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Garlick’s Arch development because of the highly questionable way it was slipped into the Local Plan at the last minute without any prior consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4356</th>
<th>Respondent: 15701089 / Nick Allen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I am also concerned about the proposal to inset East Horsley from the green belt (Para 4.3.16). East Horsley retains its country village character as a direct consequence of its low housing density and significant green space and woodland features, all of which would be at risk with the reduced protection should East Horsley be removed.

I also note that each of the proposed developments has a housing density far above any comparable housing in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17768  Respondent: 15701089 / Nick Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There does not appear to be any framework to ensure that the affordable housing is distributed sensibly within the borough, there is little demand for one bedroom accommodation in an area such as Horsley where the councils own studies show that three bedroom houses are in more demand.

There is also no protection from right to buy which would most likely lead to the accommodation being purchased and sold on for the profit of a select few individuals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17769  Respondent: 15701089 / Nick Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lastly the plan does not address the over-stressed and inadequate infrastructure of the area such as the condition and widths of the roads and the schooling requirements of the inhabitants.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17767  Respondent: 15701089 / Nick Allen  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in response to the submission of the proposed local plan for Guildford borough

I am concerned with the volume of development proposed, it appears to be far in excess of any natural growth of the borough.

It appears that the numbers used to justify the development have double counted some sectors which gives the illusion of demand that Guildford is obliged to fill when it does not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I wish to register my strong objection to the proposed submission local plan (strategies and sites) June – July consultation

The first line of your proposed Policy P2 states, “We will continue to protect the Metropolitan Green Belt against inappropriate development.” It then fails to do so.

I am a resident of West Horsley and am totally opposed to the village's removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries. The village is well into the green belt and should remain so.

Nowhere in your proposal are exceptional circumstances or any other justification made for the new Green Belt boundaries that will result from the proposed insetting of the two parts of the village from the Metropolitan Green Belt

I believe the Green Belt & Countryside Study is flawed

Certainly West Horsley's defined Settlement Area boundaries (ref 2003 Local Plan) DO NOT need to be extended

West Horsley Parish is one of a varied mix of well established low housing density settlements with a considerable number of historic buildings. We are positioned on the north side of the North Downs, partly in the Surrey Hills AONB, and attract a considerable number of recreational visitors (walkers and cyclists) through the seasons each year

the Key Evidence document 'Guildford Borough Economic Strategy 2013-2031 makes absolutely no case for locating large numbers of homes in West (an increase on current house numbers of 35%) and East Horsley or neighbouring villages and the proposed new economic development site proposals are on the opposite side of the Borough to West Horsley
Policies S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes

I further object to this proposed policy.

Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages. The Site Allocations list totals 12,698.

This size of expansion in our village is unsustainable. With only one small shop, no post office, very limited weekdays only bus service through the village, it is clearly not suitable for the proposed high volumes of new housing development.

The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village. The homes building proposals are unsustainable in terms of schooling, drainage, roads capacity, shops, parking in East Horsley (shops and station), public transport.

The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven and nothing in your documentation says otherwise. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.

Policy i3: Sustainable Transport for new developments

I object to this policy. Developers will be expected to propose and secure travel Plans for their developments and contribute to transport arrangements for the able and disabled.”. This proposed policy is too soft and is unrealistic where development and major housebuilding companies are involved. The roads in the area were founded many years ago when cars did not exist. They can hardly cope with the current volumes, let alone the increase that your plans would deliver.

GENERAL OBSERVATIONS:

Have the authors of this proposal ever lived in or even visited a village community of our size. If they had, they, like me, would be objecting as I do to the plan in its current form.

The small grocers store at the southern end of the village may close later this year as the shop owner is retiring. There has always been very limited parking outside this store.

People using East Horsley’s shops and its Public Library in 2016 experience more and more difficulty in parking their cars at most times of the day. The proposed large increase in population of West and East Horsley will make parking and movement into and through the village considerably more difficult and time consuming.

There is a continuing lack of state primary school places in the village. The Raleigh school which serves both East and West Horsley is full every year and this has been the situation for many years.

Secondary school places are limited in number at the Howard of Effingham School and other secondary schools involve a much longer journey of time and distance from the village to reach them.

Glenesk and Cranmore private schools are well supported by many families living in Guildford and other villages up to 14 miles away. Each of these private schools during term time, receives high volumes of traffic going to and from each school at each end of the school day, on Ockham Road North and the A246 respectively.

Again I object to this plan.

Medical facilities –

Kingston Avenue Medical Centre, serving all of East and West Horsley and areas beyond, is always extremely busy and residents experience difficulty in making appointments. Yet your plans are for expansion after five years. The planned
population increase which you are predicting for the Borough will require a major extension of the Royal Surrey Hospital to cope. Therefore, I object to the way your plan does not recognize medical needs.

**Transport**

Horsley station has frequent trains to London and Guildford 7 days a week, the station car park is normally full on weekdays. An increase in village population will increase pressure on station parking and traffic movements to/from Horsley station to drop off/collect travellers to London and school children going to Guildford and Leatherhead.

Traffic generation from the proposed new housing areas will be considerable. Most households in rural areas as a necessity have 2 cars, many having 3. Journey times on local roads will increase significantly.

Therefore I object to your plan.

**Waste water Infrastructure –**

There are known sewage overflow problems in the Ockham Road North / Green Lane area.

Thames Water has advised Guildford Borough that the area’s wastewater network is unlikely to be able to support the demand anticipated from all the proposed developments. The foul drainage system from West Horsley to the treatment works north of Ripley, will need to be upgraded to cope. Thames Water advise ‘a 2 to 3 years’ lead-in period’ to install the necessary waste water network and treatment capacity after planning permission for a development is granted.

All in all, this is a badly thought out plan, which does nothing but bring distress to the residents of villages such as West Horsley. It must be withdrawn.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/4358  **Respondent:** 15701857 / Melissa Freeman  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have lived in the Horsley area for nearly 28 years.

I completely understand the need for more housing, especially affordable housing, in and around the Guildford area. However, I would like to object to the proposed local plan, particularly for the Horsley area, for the following reasons:-

1. **Transport.**

Public transport in Horsley and Effingham is already pushed to its limits. I think it's fair to assume that each new household will have at least one, but probably 2, cars. Having done school runs through Ripley and Horsley and Effingham for over 10 years (no bus service), I know that rush hour is awful on the roads and will not be improved by the introduction to the area of a further 500+ vehicles, if 500+ more homes are built. This does not include all the extra traffic expected to East Horsley station should the Wisley/Ockham and Send/Send Marsh developments go ahead.
1. Resources

Having spoken at length to a local builder, who has lived and worked in the Horsleys for over 50 years, I understand that the water supply in West Horsley could only support another 20 homes in its current state. Provision of water and dealing with waste water is not something that can be done after the event. The local plan seems to be very vague on how this vital infrastructure can be dependently delivered in time, if at all. It also appears that Thames Water themselves don't believe that level of development is suitable or sustainable.

1. Percentage increase

West Horsley is proposed to have a 35% increase in its housing. I strongly object to this percentage, especially when the proposal is that the Horsley villages will be removed from the Green Belt. There will undoubtedly be a huge loss of amenity with this sort of increase in population and buildings. If the development of Wisley/Ockham and Send/Send Marsh goes ahead, this would be exacerbated further. This percentage increase is far greater in the Horsleys than any other area in the local plan and is totally disproportionate.

1. Infrastructure

The local infrastructure is already close to, if not at, full capacity.

The schools (both public and private) are full.

The roads are very congested and it's difficult to park at:- the local shops, who we'd like to support, and The station, as we'd prefer to use public transport.

According to local sources, medical facilities are 'stretched'.

As previously mentioned, water provision and waste water systems are already at capacity. Little Cranmore Lane regularly floods because Thames Water will not install a pipe that is big enough to deal with anything other than light rainfall, despite numerous requests to do so. Can they therefore be trusted to provide adequate water and drainage and deal with waste water for another 500+ houses?

I hope that the Planners can come up with a more sustainable and sympathetic way to increase the amount of housing in the Guildford area, without the amount of negative impact that this plan would inflict on the local community and countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/8028  Respondent: 15702497 / Isabella Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the erosion of the greenbelt, the development of the Garlicks Arch area and especially the development of an on/off ramp to the A3 at West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17802  Respondent: 15702497 / Isabella Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I also object to the proposed development at Wisley and Gosden Hill farm. The proposed developments are too great for the road infrastructure.

I also strongly object to the need for any additional new schools and doctor’s surgeries in the area. I am 19 years old and have completed a wonderful education using the existing schools and Merrow Surgery has also served me well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17801  Respondent: 15702497 / Isabella Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I use the A247 to walk my dog to the park in centre of West Clandon. The road is already WAY too busy and unsuited to the current volume of traffic and LGVs. It’s only a matter of time before a pedestrian is killed on The Street.

I have also just passed my driving test and am already fed up with the congestion at the top of the A247 at the “Clandon Cross roads”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17800  Respondent: 15702497 / Isabella Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
**Response to Guildford Borough Proposed Submission Local Plan (June 2016)**

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/4366  **Respondent:** 15703873 / Neil Taylor  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

---

We strenuously object to the Proposed Submission Local Plan issued June 2016 on the following grounds:

1. Guildford Borough Council proposes to remove East & West Horsley from the Green Belt.

In section 4.3.16 the plan states that “National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances”. GBC has not been clear what exceptional circumstances exist that support a 25% increase in the housing stock of the borough when the Office of National Statistics (“ONS”) are projecting a population increase of 15% for Guildford Borough over this same period.

In section 4.3.24 the plan states that “Development within villages in the Green Belt is limited to small scale infilling”, yet for the Horsley’s this infilling numbers more than 533 new houses which represents a 25% increase.

The proposed plan further states that “We will continue to protect the Metropolitan Green Belt” which we hole-heartedly applaud. The plan further states that “The AGLV will be retained until such time as there has been a review of the AONB boundary”. Yet GBC goes on to propose that some 65% of developments will be made on land that is currently Green Belt.

East Horsley moving to “inset” from being “washed over”, means that any green spaces within the village potentially be built on in the future. GBC also proposes to move many of the settlement boundaries around East Horsley in particular by redrawing the western boundary removing over 5 hectares of agricultural fields from the Green Belt as well as Kingston Meadows. These open spaces contribute to the openness and character of the village, including providing valuable outdoor space that contributes the social and physical wellbeing of all residents. NPPF rules state that Green Belt boundaries should only be changed in ‘exceptional circumstances’, yet GBC has not provided evidence of exceptional circumstance.

1. No consideration in the proposal is given to current infrastructure and services which are already overloaded:
In section 4.1.13 of the plan Station Parade, East Horsley is listed as a district centre. Yet more closely meets the definition of a local centre. “The borough’s local centres range from the small centres with only five to 10 commercial premises or public facilities such as library or village halls, through medium sized local centres with between 10 and 15 premises, to large local centres, such as Woodbridge Hill in Guildford which has 29 units.” GBC has not indicated it’s reasoning for this listing and also the potential impact of designating it a district centre. The local East Horsley shops whilst sufficient for the current number of residents are insufficient to support an additional 533 households, and there is a lack of available land in the current shopping parade to support development, this means that the local character will be irreversibly impacted by redevelopment.

No consideration is made on the impact to local schools which are already heavily oversubscribed from the additional 533 households in East and West Horsley, nor to the addition of 2000 additional households in the nearby Wisley site which will not have schooling for many years.

No consideration has been made to the impact to local medical facilities, roads and car parks. Parking at Horsley & Effingham junction stations (which are already full), at the shops, at the medical centre and at the village hall will all be affected.

In both East and West Horsley the principal through roads are narrow and winding, having pinch points that would be unsuitable for HGV traffic. Although it is stated that funding will, at least in part, come from developer contribution, there is no clear plan as to how the roads will be made to accommodate the increase of traffic or how existing problems such as pot holes, uneven surfaces, lack of pavements and street lighting will be resolved, the latter posing a significant safety risk to residents.

We respectfully ask that you do not adopt this plan and take into consideration the objections from both this recent planning period and the 20,000 objections to the 2014 draft planning consultation. Please protect our green belt and our legacy to the future generations of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/4367</th>
<th>Respondent:</th>
<th>15703905 / Ryan Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a local West Horsley resident I object to The Guildford Plan removing East and West Horsley villages from the green belt and the proposed significant increase in housing developments.

- there is already insufficient school places both at primary (The Raleigh) and secondary schools (the Howard of Effingham), a material increase in the number of houses in East and West Horsley will result in many children not being able to attend schools locally but will have to travel to other villages and towns.
- the infrastructure cannot handle the proposed increase of housing in west and east Horsley village, there have bee no clear plans provided by The Guildford Plan on how traffic and environmental issues will be addressed. There are already limited parking facilities in both villages, which cannot support the extra cars and traffic as a result of the increased housing.
- local facilities, such as medical cannot support an increase of housing as proposed by the Guildford Plan.
- removing west and east Horsley from the green belt will completely alter the character of the local area.
The Guildford Plan is unsustainable and not proportionate in the Housing proposals in West and East Horsley, the green belts and characters of our local villages need to be protected, and any development needs to be in line with what local infrastructure and facilities can support. I thus strongly object to the Guildford Plan in regards to West and East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4368</th>
<th>Respondent: 15703937 / Graham Vickery</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Removal of West Horsley from the 'Green Belt' in contravention of national government policy intended to protect the Green Belt from general development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8036</th>
<th>Respondent: 15703937 / Graham Vickery</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Already Rejected Proposals. I object to the GBC rejecting plans to develop the former Wisley airfield due to among many things a breech of national regulations as to the levels of nitrogen dioxide and particulates in the environment, and yet now includes this site in the Draft Local Plan. Utterly disingenuous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17831</th>
<th>Respondent: 15703937 / Graham Vickery</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/17832</td>
<td>Respondent: 15703937 / Graham Vickery</td>
<td>Agent:</td>
</tr>
<tr>
<td>---------------------------</td>
<td>----------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan not making any comprehensive provision for the social infrastructure that must go with such a huge building programme. That is schools for the new population, more health centres, the means of accommodating their vehicle movements at the station, the car parks of the village and simply getting around on our roads built for 19th century traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17830</th>
<th>Respondent: 15703937 / Graham Vickery</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to no evident thought and absence of information provided to residents as to how access from existing roads to the proposed development sites will work. ie. traffic lights, mini roundabouts etc. Ockham Road to the junction with East Lane is already impassable at school arrival and leaving times. More than doubling such traffic will simply clog the roads and bring the villages to a standstill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the plan not taking into proper consideration the flooding Level 3 risk at the north end of the village toward Ockham where all natural surface flood waters fetch up at the drainage ponds bordering the parish borders between Horsley and Ockham and thus why the area has never been developed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/2043  Respondent: 15703937 / Graham Vickery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I object to the above matters not even being addressed in the plan and so showing a complete disregard for the long term well being of existing residents and rates payers who deserve far greater respect than GBC has shown them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4373  Respondent: 15704737 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are multiple developments proposed in the Merrow and Burpham area. The road infrastructure cannot cope currently - these developments in the area will cause terrible issues. Any new development or changes MUST be pre-dated by new infrastructure. It is no good if the road changes are made after developments and changes are made.

The sustainable movement corridor seems to be a huge cost with little benefit. I would suggest that this is very carefully reviewed for cost effectiveness. It would certainly have zero benefit for those of us living in Merrow and would cost a huge amount of our funds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8039</th>
<th>Respondent: 15704737 / Sarah Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• I have always felt that the housing need number is too high. 693 is far too high and when you read the detail of the workings, although the full detail appears unavailable which is unacceptable, there are huge errors. This was commented on and flagged in the last draft consultation but appears to not have been addresses. GBC should not blindly follow the recommendations from GL Hearn, especially if they are unable to supply GBC with detail of the underlying formulas!</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the usage of green belt in any area of the plan. This all needs to be reworked based on a new and correct housing need figure. Green belt must be sacrosanct, as promised by the Government.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17843</th>
<th>Respondent: 15704737 / Sarah Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Specifically I object to the Gosden Hill development. An appeal was made by the developers to overturn a previous GBC refusal for this plan in the 1980’s. This went to appeal and GBC fought and won and the refusal was upheld. Why on earth is this now in the local plan. Nothing has changed since then. The site is still inappropriate, the infrastructure is woefully inadequate and putting 2000 homes in this area would severely impact an already very busy area. There is little or no detailed information and the suggestion is so unripe it should not even be a suggested site in the plan. This land is greenbelt and as such should be left as the buffer to town encroachment of the countryside, as was it’s purpose. If this was passed - which it should NOT be - there should be a 4-way junction from the A3 and NO exit through Merrow and Burpham. This would mean that traffic would be sensibly routed around the development. Additionally if there is to be a new station at Merrow, the station itself should be on the Gosden Hill side of the development. The lane to the current Merrow depot is too small and narrow to take the traffic. The junction is too small and dangerous, with the railway bridge also causing issues. The 90 degree turn also causes accidents and near misses regularly. Should the station not be sited on the Gosden Hill side of the track, the parking and all access to the station must be via a footbridge from that side. The Merrow Lane route to the depot is far too small.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The University should be made to house almost 100% of its students. The housing market in Guildford is ruined by the huge number of student homes, which are always badly kept and a mess. House them all on campus land and free up the other housing for those non-students who need them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID: PSLPP16/17844  Respondent: 15704737 / Sarah Smith  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We need more smaller houses in Guildford. Starter homes with 1 or 2 bedrooms would be better. New developments all appear to be for 3+ homes, many are 5 bedroom homes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID: PSLPP16/17845  Respondent: 15704737 / Sarah Smith  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Greenbelt land should not be built on as promised by the government. It should stay as the natural buffer between town and countryside, which is the reason it was created.

There are many other small issues in this plan but I felt I would voice my concerns and objections to the main points.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Please find below my comments to the GBC Local Plan, in time for the 11.59 deadline today. I would appreciate confirmation of your receipt of this email.

Comments and Objections

We appear to have had very little time to read and understand all the many documents for this new local plan. Time has been extremely tight to be able to do so. Timescales should have been extended. Additionally to have the deadline around holiday season is more than unfortunate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2047  Respondent: 15704737 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We need to see the Town Centre Master plan to enable viable comment. Currently I can only say that I object to the town centre plans but am unable to give you full detail as there is nothing to discuss.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4374  Respondent: 15704865 / Lauren Hunt  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary space between Woking and Guildford.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockharn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/8041  **Respondent:** 15704865 / Lauren Hunt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be at a standstill all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a rat run to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17848  **Respondent:** 15704865 / Lauren Hunt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17849  Respondent: 15704865 / Lauren Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17846  Respondent: 15704865 / Lauren Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs and population center.

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17850  Respondent: 15704865 / Lauren Hunt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17847</th>
<th>Respondent: 15704865 / Lauren Hunt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4379</th>
<th>Respondent: 15705121 / Rachael Anderson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to register my objection to the local plan on the following points:

- proposal to remove Horsleys from the green belt - it is essential that an area such as the Horsleys remains in the green belt and should not be removed for the sake of convenience to assist planning proposals. 'Exceptional circumstances' need to be demonstrated before such a step can be taken and this has not been done.
- extension of the boundaries of the settlement areas of the Horsleys - I cannot identify any sound reasons for such an extension contained in the plan. Therefore, it should be the case that the status quo remains.
- infrastructure - no detailed thought or planning has been given to the infrastructure adaptation that would be required for the number of new dwellings in the local plan. The Horsleys are already stretched in terms of school places. Further roads/drainage would need to be implemented and the inherent structure and feel of the Horsleys would be adversely affected
- number of houses - an appropriate method to determine how many dwellings the local area could feasibly sustain has not been applied. the plan has been proposed without proper depth of thought as to the impact and practicalities that would need to be involved.

The plan seeks to implement a local plan which is not sustainable and would materially adversely affect the existing residents of the villages. The proposal does not sufficiently support the number of houses contemplated.

I would urge the council to reconsider the local plan given it is ill thought out and unsustainable for the reason specified above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/8047   Respondent: 15705281 / Anna-Maria Mitchell   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Gosden Hill site at Clandon/Burpham for 2,200 homes as the local schools, medical facilities and utilities are already at capacity and would not be able to handle the vast increase in the local population that would come with the development of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/8046   Respondent: 15705281 / Anna-Maria Mitchell   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed development of the Garlick’s Arch site at Burnt Common for at least 400 homes plus industrial site. There is insufficient infrastructure in the surrounding villages of Clandon and Ripley to make this development viable. Further, it is not appropriate to clear the ancient woodland and the accompanying habitat for this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/8048  Respondent: 15705281 / Anna-Maria Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 4 on/off ramp at Burnt Common to the A3. This would cause a huge increase in the volume of traffic through our villages of Clandon and Ripley. The A247 is extremely narrow in places so it would be inappropriate to increase the flow of traffic down this road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17859  Respondent: 15705281 / Anna-Maria Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in traffic in Clandon and Ripley that would be caused by the planned development. There is a lack of public transport in these villages which means that the residents are heavily reliant on cars. The roads in these villages could not accommodate any increase in traffic. As a resident of West Clandon, I have experienced first hand the traffic on these roads. They are far too narrow in places and highly twisty in parts to accommodate any more traffic. It can be really difficult crossing the A247 in parts during rush hours and I would be worried that more cars on the A247 would be dangerous for the residents of Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17857</th>
<th>Respondent: 15705281 / Anna-Maria Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the ‘in-setting’ of villages from the greenbelt, especially Clandon and Ripley. The greenbelt protection of these villages gives them a unique character that should be celebrated and conserved instead of destroyed.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17858</th>
<th>Respondent: 15705281 / Anna-Maria Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the unsustainable development proposed by the local plan. The proposed development of 13,860 new houses would destroy the local communities. The number of houses that are proposed to be built is completely disproportionate to the number of houses which are currently in the villages of Clandon and Ripley.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2050</th>
<th>Respondent: 15705281 / Anna-Maria Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
</table>
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I very strongly object to the Guildford Borough Proposed Submission Local Plan (June 2016).

Firstly, I would like to highlight that it is highly irresponsible that the council has set a 6 week public consultation period as the proposed submission has the potential for devastating, long term effects on our local villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4383</th>
<th>Respondent: 15705313 / Lisa Sarti</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I OBJECT to the 2016 local plan in its current format.** I do not believe that it is sound and is not yet fit for implementation.
   1. The council relies on a strategic housing making assessment that is in question. The council have not scrutinised the figure provided and rely purely on the fact that other councils have used the consultant GL Hearn to assess the housing need. The SHMA appears to be exaggerated against ONS data. Two independent reviews have identified similar faults, which suggest that the figure is too high and inaccurate. They also identify that the recent referendum result relating to Europe may have an impact on economic growth and consequently should be reviewed. The SHMA must be reviewed to ensure that it is accurate before the housing figure is agreed.
   2. The council have chosen not to impose any constraints in respect of the OAN.
      1. The Council highlight that the borough is 89% greenbelt and yet proposes to build approximately 65% of new development on greenbelt.
      2. The council appropriately identifies that the enhancement of the A3 is essential to the scale of development possible within the local plan. Page 21 Strategy and sites states 'The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford'. Highways England have made no commitment to improve the A3 and yet the local plan still seeks to deliver the full housing target through the delivery of three of its four strategic sites sighted directly beside the A3. The transport survey also highlights that traffic will be impacted and congestion worsened irrespective of what improvement measures are put in place.
   3. The Council have failed to consult effectively with infrastructure providers prior to publishing the draft local plan and as a consequence the Raleigh school has only recently put forward a proposal to build a new school on site A41. I am unable to comment on this because I do not have sufficient information.

2. **I OBJECT to altering the green belt boundaries.** Para 83 NPPF states green belt boundaries can only be altered in exceptional circumstances and where there is local support. Meeting the housing need is not
exceptional circumstances. This has recently been reiterated by Central Government. No exceptional circumstances have been demonstrated.

3. I OBJECT to the use of the 'Green belt and countryside study 2014' within the evidence base. This is a subjective view of the green belt provided by one company. It is not evidence. It does not provide exceptional circumstances to remove land from the green belt.

4. I OBJECT to the use of the transport study within the evidence base. The SINTRAM model is designed for major routes and is not suitable for local roads as it takes no account of junctions. The three hour period also skews the data disproportionately downwards. This means that it will not necessarily provide a true reflection of traffic movement within Guildford. A different model should be used and the peak times adjusted to accurately reflect traffic, particularly within rural areas

5. I OBJECT to the disproportionate amount of development in this small area of the borough; The area surrounding East and West Horsley will attract in excess of 5000 new homes, which accounts for over thirty-six percent of development. The area is predominantly rural in structure, nature and environment and does not have the infrastructure to cope.

6. I OBJECT to the disproportionate increase in housing in West Horsley. The local plan proposes an increase of thirty-five percent for a rural village, this is totally out of character. The density suggested by the council is not in keeping with the current environment, almost double the levels within the majority of the village.

7. In line with Central Government guidance I OBJECT to development on areas of high agricultural value. This includes Wisley airfield. If it is necessary to build on agricultural land it should be of low quality.

8. I OBJECT to the fact that there is no provision for a larger primary school within East or West Horsley despite the fact that Para 38 NPPF states that for large developments a primary school should be built within walking distance. Over 500 houses within East and West Horsley is large development when considering the size of the villages. The Surrey infrastructure review does not state that a new school is necessary despite the fact that the school is already oversubscribed causing children to be driven to other villages. (They do state the school may in the future identify a suitable site through infill opportunities). Surrey have suggested that children from the Horsleys can be accommodated either in Ripley or Clandon; both of which would necessitate parents driving, and in the case of Ripley travelling through a traffic blackspot.

9. I OBJECT to the local plan making East and West Horsley less sustainable. This is breach of para 7 and 9 NPPF and policy S1 of the proposed local plan. Failing to provide essential health, education and community facilities forces residents to use private vehicles to reach these when at present the majority can walk. The Infrastructure survey suggests that primary and junior school aged children will have to travel to Ripley and Clandon to attend school. No provision is made for any other facilities including health, dental, community and sport.

10. I OBJECT to the inclusion of Policy A41 relating to land south of East Lane. This is in contravention of para 85 NPPF which states that borders must clear and readily recognised. The natural border is the wood to its east. The inclusion of this site is not in keeping with the current settlement and character of the village; houses front East Lane up the woods to the east of this site which borders the road for approximately 400 yards. The land is green belt, no exceptional circumstances are made.

11. I OBJECT to the inclusion of A35 Wisley airfield in the local plan. The principle of the local plan is a presumption in favour of sustainable development. The Housing and Planning Act 2016 grants permission in principle to any development included within the local plan leaving only technical details to be considered by planning authorities. The site at Wisley failed in its planning application on a large number of points including infrastructure and sustainability. It is highly unlikely that these will be met in the future due to its positioning. Part of the site is green belt and no exceptional circumstances have been demonstrated. Aspects of the site also include high quality agricultural land.

12. I OBJECT to the fact that the Local plan does not effectively demonstrate proposals to improve road networks to accommodate the additional vehicles likely to travel through East and West Horsley. The majority of through roads are narrow, have pinch points and are subject to closure through flooding on a regular basis

1. LRN7 intends to introduce interventions to address potential highway performance issues resulting from the development of Wisley airfield. If these are those put forward by the developers they are likely to have a significant negative impact on East and West Horsley, or any traffic travelling to or through even without additional housing

2. LRN22 East and West Horsley traffic management and environmental improvement scheme is non specific and the suggested £1m is insufficient to make sufficient improvements to deal with the substantial traffic increase likely if all aspects of the local plan are allowed.
13. **I OBJECT to the council failing to deliver sufficient infrastructure** to cope with the proposed development within this area of the borough. The bus network is almost non-existent and new buses are linked only to the Wisley development. The train station car-parks at Horsley and Effingham junction are always full and there is no space to enlarge them. The roads are not suitable for commuters to cycle any distance due to the narrowness of the roads, speed of traffic and lack of space to build cycle paths.

14. **I OBJECT to the area described as West Horsley (south) being removed from the green belt.** This clearly meets the description of a village that should be 'washed over' by the green belt in terms of size, appearance and character.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPA16/4384  **Respondent:** 15705473 / Shane Ince  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I refer to Guildford Borough Council's New Draft Local Plan, especially with respect to the following proposed development sites: Thatchers Hotel, East Horsley (ref A36, ID 2044); Ockham Road North, East Horsley (ref: A39, ID 240); Bell & Colvill Garage, West Horsley (ref: A37, ID 1 6); Ockham Road North, West Horsley (ref: A40, ID 975); Manor Farm, West Horsley (ref: A38, ID 1 5); East Lane, West Horsley (ref: a 41, ID 2063) and the Wisley Airfield site.

I strongly object to the proposals in the New Local Plan to build what seems to be an excessive number of new houses in the villages of East Horsley, West Horsley and the surrounding areas. The proposed development of over 500 houses in the Horsleys plus another 2,000 houses at the Wisley Airfield site will hugely change the character of the area irreversibly destroying the existing village character, the quality of life of its residents and, undoubtedly, property values.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/17860  **Respondent:** 15705473 / Shane Ince  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Insufficient local infrastructure to support the increased housing - current parking, school facilities, medical facilities and transport facilities are already stretched and inadequate for existing needs. The excessive addition of the proposed housing will put an intolerable strain on the local community and inevitably result in a deterioration of such facilities, higher costs, lower quality and a poorer standard of living for residents. The existing and planned infrastructure simply cannot sustain such an increase in housing and people in this small area in my view.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17862  Respondent: 15705473 / Shane Ince  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Medical and schooling facilities - I am not convinced that the standard of local facilities provided for the education of our children and the treating of our infirm and elderly residents can be maintained with the addition of some many more houses and people. Existing facilities will be rapidly overloaded, while limited space exists to expand these to cope viably with the increases under consideration in your New Local Plan.

Negative environmental impact - the addition of so many more houses in the area will inevitably take its toll on the environment in terms of overloading our already old (in many cases) water drainage systems (both rain run-off and waste water), increasing noise pollution during construction and impacting air pollution from the additional cars that would inevitably come with the additional houses and people in the area. This can only lead to a detrimental impact on the health and safety of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17861  Respondent: 15705473 / Shane Ince  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Transportation congestion - existing roads and train routes (and the associated car parking facilities) already struggle to cope with the current daily load factors resulting in car transport tailbacks and train overcrowding at peak times. Adding more people and cars will only exacerbate this problem. Additionally, during the many years required to construct these houses, the road users and residents will be subject to significant inconvenience from the movement of heavy lorries and equipment and the delivery of building materials which will, doubtless, cause significant wear and tear on the roads (which it seems even now are only repaired infrequently).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17863</th>
<th>Respondent: 15705473 / Shane Ince</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
</tr>
</tbody>
</table>

Whatever happened to the Green Belt - I fail to understand why the above referenced developments are being given serious consideration given the protection that I had understood to be provided by the "green belt" concept. Proceeding with the above developments on the scale currently envisaged can only lead to the increased "sub-urbanisation" of the area and the loss of the village character of the Horsleys and the surrounding area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2051</th>
<th>Respondent: 15705473 / Shane Ince</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
</tr>
</tbody>
</table>

As a local resident and tax payer, I am strongly opposed to these developments and would urge you to take my views into consideration when deciding on the New Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Appendix C
AM Active Modes

Infrastructure Projects AM1 Guildford Wayfinding Signage System and AM2 Comprehensive Guildford Borough Cycle network are listed for completion between 2016 and 2033. This must be brought forward for completion within 10 years and funding found to ensure this happens. The return on investment will be repaid tenfold

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Appendix D

Include reference to the Guildford Borough Transport Strategy 2016

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2.13 This states that we have a reasonable network of Cycle Routes and footpaths! We strongly disagree and ask this to be corrected. There is no network, only a series of disjointed cyclelanes, too narrow to ride in safely, mounting footpaths and rejoining carriageways, and usually terminating for no reason with the word END written on the road. Basically telling cyclists to fend for themselves after that point! Some of the cycle routes are in a dreadful state of maintenance and therefore if any new routes are created their future maintenance must also be planned for. The above statement should be redrafted to say Guildford has a poorly connected array of cycle routes which in some cases are badly maintained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17869</th>
<th>Respondent: 15705537 / G-Bug – The Guildford Cycling Campaign (Doug Clare)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent:</td>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure and Delivery

4.6.19 As a Key Evidence document the Guildford Borough Transport Strategy 2016 must be included in Appendix D but is not. As an important Local Plan document we comment on this separately at the end of our consultation response.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17872</th>
<th>Respondent: 15705537 / G-Bug – The Guildford Cycling Campaign (Doug Clare)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent:</td>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy 13

Please add the bullet points below:

- New developments must include segregated cycleways linking to nearby schools and the Guildford Cycle network
- All new houses must have cycle storage and safe cycle parking must be provided on site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2123  Respondent: 15705537 / G-Bug – The Guildford Cycling Campaign (Doug Clare)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Transport Strategy 2016

This makes a disappointing read as an initial search for Cycling policies finds them hidden away with Walking in an Active Modes Strategy. These are so important for the future of a healthy, pollution reduced, congestion free Guildford that they should each be given their own separate strategies.

However we comment on the various strategies as listed and request that all bullet points below are incorporated in these strategies:

3  Our Rail Strategy

- The safe cycle storage at Guildford Station should be greatly increased to 2000 bikes and include CCTV cameras for security.
- All other stations should increase safe cycle storage and security.
- A ‘Boris’ bike scheme with both normal and electric bikes should be introduced at Guildford Main and London Road stations to compliment the small Brompton Scheme at the Main station not replace it.
- Cycle access needs to be improved to all railway stations to provide segregated access for cyclists.
- More cycle storage needs to be provided on trains.
- A cycle hub is listed as an improvement with no explanation what this involves? Please explain.

4  Our Strategic Road Network Strategy

- The A3 improvements should include provision for a segregated Cycle super highway from Guildford to London and in the future to Portsmouth.
- The strategic Wooden Bridge footway over the A3 and A25 needs replacing with a wider joint cycling and walking bridge.
5 Our Local Road Network Strategies

Our local roads and parking strategy

- All main A roads through Guildford Borough should have segregated safe two way cycleways to replace the existing footpaths and be shared with pedestrians, eg A25 to Dorking, A246 to Leatherhead, A31 to Farnham, Woking Road and Worplesdon Road.
- Park and rides should have ‘Boris’ bikes (normal and electric) installed with segregated Cycle routes to the Town Centre
- All schools should have Cycle to School plans and all roads within one mile of schools should be 20mph zones

Our bus transit strategy

- The sustainable movement corridor SMC must not be just for buses but must include segregated cycle lanes as well
- There should be cycle storage and Boris bikes at the Main bus station

Our active modes strategy should be split into our cycling strategy and our walking strategy

- Guildford needs to create an integrated safe cycle network throughout the Borough.
- This network needs to start with safe routes through the town centre which need to be designed in accordance with the Master Plan Options for the Town Centre gyratory system. However in the interim period safe routes must be provided for cyclists to avoid the gyratory and these require in some cases sanctioning shared use of pavements with pedestrians.
- A Town wayfinding cycle map must be provided showing the full network. This should be positioned at strategic notice boards around the town ie the station and also be available as leaflets.
- We support the sustainable movement corridor SMC concept but need to be sure that this will include segregated two way cycle lanes
- On certain routes the sharing of pavements with pedestrians should be encouraged but cyclists need to practice safe cycling etiquette to achieve this and persuade pedestrians to share their surface
- The various cycle routes in the villages should all be integrated into the proposed network such that all villages are linked in.
- New development must incorporate internal safe cycling routes and also contribute financially to the cycling network

7 Our road safety strategy

- Improved facilities are promised for pedestrians and cyclists. Unfortunately as cycling casualties are increasing so is the urgency for the gyratory and the full cycling network to be implemented. Funds must be provided to enable this work to be completed within ten years, not fifteen years as proposed.

Summary

We applaud Guildford for the introduction of the Guildford Borough Transport Strategy 2016 but feel that Cycling is too far down the list of priorities. If Guildford wants to reduce congestion, reduce pollution, and improve the health of its inhabitants, the quickest and most cost effective way is to improve its cycling infrastructure to create a fully integrated network of safe cycle lanes and cycleways. As in London, this can supply the town with a tenfold return on investment, and therefore needs to be implemented immediately as a top priority.

Build it and we will ride it!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3.2 Spatial Vision

While this discusses encouraging visitors to use alternative modes of transport and having policies that reduce car traffic it must come out and say we need to create an integrated safe cycle network throughout the town which in turn connects to all parts of Guildford and on to neighbouring towns such as Woking, Leatherhead, Godalming and Farnham. The return on investment for the town by spending money on improving cycling infrastructure will be at least tenfold.

The vision for Guildford must follow London’s example and wake up to the health, pollution and congestion solutions that cycling can achieve. Build it and we will ride it!

Core Theme – INFRASTRUCTURE

This has a strategic objective to deliver a safe transport system balanced in favour of sustainable transport modes! Let’s talk CYCLING and WALKING, not Sustainable Transport modes please.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Strategic Housing Market Assessment. SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

These figures are at odds with figures used previously @ 322

As this figure cannot be verified, the lack of transparency is not right for consultation on the Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| Comment ID: | PSLPS16/8053  | Respondent: | 15705729 / Martyn Heard  | Agent: |
|-------------|----------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43) |
| The site is not appropriate because, there are no plans to improve schools, surgeries, or utilities. |
| Garlick’s Arch is protected from development as Green Belt, and I do not believe there are valid 'exceptional circumstances' for its removal. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: | PSLPS16/8054  | Respondent: | 15705729 / Martyn Heard  | Agent: |
|-------------|----------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) |
| North facing ramps to the A3 at Burnt Common would be a disaster for local communities. The added traffic passing through Ripley, Send and Clandon would be enormously detrimental, It would not be sustainable as access through these villages cannot be improved |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: | PSLPP16/17877  | Respondent: | 15705729 / Martyn Heard  | Agent: |
|-------------|----------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Living in Newark Lane, I am only too aware of the already overloaded narrow country roads - local development on the scale proposed would be unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

As it is clear that no improvements to the A3 or M25 would be possible before 2020, no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to poor air quality concerns (Policy I3)

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further congestion and to greater levels of air pollution, which will have a detrimental effect on the health of local residents especially the young and elderly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
| **Comment ID:** | PSLPP16/17880 | **Respondent:** | 15705729 / Martyn Heard | **Agent:** |
|----------------|----------------|----------------|--------------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **Answer (if comment is on questions 1-7 of the questionnaire):** |

I object to development in areas which are at risk of flooding (Policy P4)

The Plan does not take adequate account of flood risk. It appears that the Councils assessment of the flooding risk is flawed.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a **higher** risk than the Council’s assessment.

This area has flooded many times in recent years.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| **Comment ID:** | PSLPP16/17878 | **Respondent:** | 15705729 / Martyn Heard | **Agent:** |
|----------------|----------------|----------------|--------------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
| **Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )** |
| **Answer (if comment is on questions 1-7 of the questionnaire):** |

I object to the Local Plan as the development proposed is **not sustainable** (Policy S1)

The proposed mass housing developments will damage local communities, especially Ripley, Send and Clandon.

The development is better suited to urban areas that can provided transport links, these plans are not for local communities, we do not have good rail links, and quite poor bus services, so that means more cars on the local roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| **Comment ID:** | PSLPP16/17876 | **Respondent:** | 15705729 / Martyn Heard | **Agent:** |
|----------------|----------------|----------------|--------------------------|
| **Document:** | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Objections to Guildford Borough Proposed Submission Local Plan (June 2016)**

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2016).

I OBJECT ON THESE POINTS

1) I object most strongly to the proposal to remove Ripley Send and Clandon from the Green Belt.

   There are Brownfield sites that could be utilised, ie at Burnt Common, before considering Green Belt development at Garlicks Arch and Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17884</th>
<th>Respondent: 15705729 / Martyn Heard</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

GBC’s proposal for 13,860 new houses differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; 36% of all the Plan’s new housing is proposed in the Ripley Send Clandon area,

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages,

this mass urbanisation of Surrey villages is deplorable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8055</th>
<th>Respondent: 15705761 / David Jenner</th>
<th>Agent:</th>
</tr>
</thead>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These developments will inevitably lead to a merging of all the areas which are at present separate entities, Wisley Airfield, Ripley including Garlick's Arch to Send and on to Clandon and Burpham. We wish to remain villages - we all live here because they are villages. The development is far too concentrated in this part of the borough and GBC has made it a feature of their plan with larger numbers than other Borough Councils in Surrey. I therefore object to the Borough Wide Strategy (Policy S2) and the SHMA figure of 693 houses per year as being too high (Appendix D).

Garlick's Arch is at risk of flooding and is classified by the Environment Agency as being at higher risk than the Council's assessment. I object to development in areas which are at risk of flooding (Policy P4). The original plan had included land at Burnt Common where there was a brownfield site this new site is absolutely wrong as it has ancient woodland and GBC's Green Belt & Countryside Report does not even cover this site.(A43) Ripley and Send together only have about 3000 households and the development would damage the historic environment as a result of the scale of the proposed development (Policy D3).

With lack of good air quality due to congestion especially in the construction stage, although even now there are problems with the numbers of diesel vehicles especially HGVs, I have concerns about healthy living. (Policy I3) This is a great place to live, but GBC is intent on destroying it.

Please take my objections into consideration and amend the Plan so that housing sites are reduced in this area for not only are we surrounded by all of this proposed by GBC, we also have to live with extra traffic due to a proposal by Woking Borough Council for houses only a mile or so away at Pyrford. This is not NIMBYism but a cry for help as you will destroy our way of life entirely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17885  Respondent: 15705761 / David Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of planned road infrastructure. (Policy I1). I live on the Portsmouth Road which runs through Ripley and Send adjacent to Garlick's Arch. We are already coping with large amounts of traffic which is often diverted onto our road when an accident closes the A3. The A3 from the junction north of the village to the M25 is almost at a standstill during the rush hour both going north in the morning and coming south in the evening. All of the above developments are sited along the A3 and with the number of houses proposed probably in the region of an extra 5000 cars will be wishing to use our local roads. Congestion will be even worse and at present Highways England has no plans to start considering improving the A3 before 2020. There should therefore be no development until this has been considered (Policy I2).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17886  Respondent: 15705761 / David Jenner  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of planned road infrastructure. (Policy I1). I live on the Portsmouth Road which runs through Ripley and Send adjacent to Garlick's Arch. We are already coping with large amounts of traffic which is often diverted onto our road when an accident closes the A3. The A3 from the junction north of the village to the M25 is almost at a standstill during the rush hour both going north in the morning and coming south in the evening. All of the above developments are sited along the A3 and with the number of houses proposed probably in the region of an extra 5000 cars will be wishing to use our local roads. Congestion will be even worse and at present Highways England has no plans to start considering improving the A3 before 2020. There should therefore be no development until this has been considered (Policy I2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17887  Respondent: 15705761 / David Jenner  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With lack of good air quality due to congestion especially in the construction stage, although even now there are problems with the numbers of diesel vehicles especially HGVs, I have concerns about healthy living. (Policy I3) This is a great place to live, but GBC is intent on destroying it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17882  Respondent: 15705761 / David Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing Ripley, Send and Clandon from the Green Belt (Policy P2) together with the proposed development sites at Wisley Airfield and Garlick's Arch. I understand there have to be exceptional circumstances for these areas to be removed as required by National Planning Policy. We are providing large areas of countryside where people can walk and ride cycles and horses and generally enjoy the open air. Why cannot existing brownfield sites such as the one at Burnt Common which was removed from the original plan, be used instead of Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17879  Respondent: 15705761 / David Jenner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local plan (Policy S1) on the grounds that the development proposed is not sustainable. How on earth can the total development of new houses some 13,860 be accommodated in the borough with no improvements to the infrastructure. We are already at bursting point with access to schools and doctors, inadequate bus services, sewage removal etc. and the road network is fast becoming gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4093  Respondent: 15705761 / David Jenner  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of brownfield sites from the Plan (Sites A4, A34 and A44). The Council claims to have adopted a "brownfield first approach" (page 5 of Plan) but this is clearly not the case and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/4095  
Respondent: 15705761 / David Jenner  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the increase in housing proposed in Tannery Lane (site A42) which has been increased by a third since the 2016 version of the Plan. Local rural roads are unable to handle this type of increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/4097  
Respondent: 15705761 / David Jenner  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the lack of proper infrastructure planning for sites A43 and A42. The lack of any plan for either the physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlick's Arch and the A42 Clockbarn Nursery in Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/4090  
Respondent: 15705761 / David Jenner  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Garlick's Arch (A43) being extended and the resulting urban sprawl, half a mile away from where I live. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Travelling Showpeople sites in A43 Garlick's Arch as the development only includes 400 houses and therefore no provision is necessary as this is not compliant with the minimum of 500 as stated in section 4.2.24 of the plan.

I object to the hiding of development by "deferment" for sites A24, A25, A26 and A43. I object to the potential and ill-defined increase in housing allocation at A43 Garlick's Arch. The potential of an increase at site A43 will be extremely harmful to the rural natures of the surrounding villages of Ripley, Send and Clandon and will cause an urban site as buildings abut local boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4091  Respondent: 15705761 / David Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the imbalance of the Plan across the borough. With the removal of site A46 from the Plan and reductions of housing planned in this version of the Plan in other parts of the borough, 40.6% of the 11,350 homes proposed in this Plan are sited within 3 miles of where I live, most of them in the Green Belt. We are already suffering from traffic chaos when accidents or roadworks are causing problems on the A3 or M25. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4092  Respondent: 15705761 / David Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The inclusion of site A58 Burnt Common now proposed once again, removes the need for A43 Garlick's Arch, surely only one site is needed, especially as they are so close to one another.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposal for a Waste Management Facility in the Green Belt site (Burnt Common A58) which is mentioned but does not allow for full and proper consultation. (More traffic on our road).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes affecting Ripley and Send, which make the Plan even worse than the 2016 proposals.

I object to the extended development in the Green Belt (Policy P2, Site A43)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy on affordable homes (Policy 4.2.23) which we need in the countryside. No extra payments from developers will ensure the Council provides the necessary number.

I object to removing Send Business Park from the Green Belt (4.3.15), this is only a small collection of local businesses and there are no exceptional circumstances as required by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17904  Respondent: 15705825 / Alan Sutherland  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Living in Guildford as a student has never been easy. For the last fifty years the continued expansion of the town through industry, retail and business has put pressure on the student community which has been traditionally pushed to the fringes of Guildford. Recently however, the phenomenon of a middle class exodus from the city into the suburbs has put unbearable pressure on the student community. All residents of the town on low income now have to compete for an ever dwindling stock of rental properties. Combined with the arrival of the amateur landlord, students are regularly ripped off with sub-standard properties and face a fight to safeguard their deposits.

As a result of this change the student community has been scattered far and wide

International students are particularly hard hit by the lack of affordable student rentals as they lack the local knowledge and have to arrange their accommodation remotely, this leaves them prone to extortion by landlords and agents, or even faced with arriving in the UK to a house that does not actually exist despite apparently having paid for one online.

Rental Values

Almost every student who responded told us the rent they ended up paying was either the same or more expensive than they had budgeted for. The average budget overspend was £47 per month, which compounds the financial difficulties faced by our students.

The average rent paid excluding bills was £457 per calendar month. This gives Guildford landlords an estimated monthly income of £2.2m. Despite this, students are regularly told they must ‘do more’ to be a part of the community even though the entirety of their student maintenance loan pays for accommodation alone.
In academic year 2014/15, University of Surrey students borrowed £21m for living costs, and the total outstanding debt for all current students and alumni is over £318m. As we have shown with the exception of the tuition fee loan, the maintenance loan is paid wholesale to Guildford landlords. Surrey students will be paying this debt for the next forty years or more.

**Transport**

As the University has committed to reducing car journeys, Surrey students have to rely on the local bus or train service. The Arriva bus service is rated poor or worse in every category that was measured.

The lowest rating was reserved for ‘punctuality’ which is no doubt a result of the poor provision of traffic control in Guildford, as the town is gridlocked at peak times.

For those students who do rely on a car such as student nurses and midwives, they face frequent berating from non-student residents who believe they have a greater right to park their car in the estate than ‘a student’.

**Conclusion**

While it is true that many students are transient in nature, this is often not by choice. Many graduates would naturally remain in Guildford as that is where the developing industries of the 21st century are based, many of whom have benefitted from the University influence.

Guildford borough development has been woefully inadequate for the last two decades and simply not kept pace with the demands of this region. As a result, Guildford is regressing to a quasi-feudal system where those who were fortunate enough to capitalise on the housing boom of the 1980’s and 1990’s hold sway over the student class who must now work almost full time to support the high cost of renting.

A privileged class of landowner holds Guildford in its grip, believing that only they have the right to a secure home, to a reliable income, and to afford the space for their car (or multiple cars). The very nature of Guildford is being sterilised as it gradually transforms into ‘Fortress Surrey’ with the drawbridge pulled up.

The students of the University of Surrey have been a part of Guildford for fifty years, they have contributed financially, culturally, physically and emotionally in the history of this town. This is the time that Guildford must now repay this faith and loyalty.

More housing is needed urgently.

Reliable transport is needed urgently.

The local plan must be implemented in full, as is drafted, as soon as possible.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**  [USSULocalPlanSubmission.pdf](USSULocalPlanSubmission.pdf) (504 KB)
It fails completely to recognise the infrastructure requirements. There are some laughable suggestions about transport. It mentions railway stations in the east and west of Guildford. There is no money in Control Period 5 or 6 for Network Rail to build these stations. There is no Train Operating company considering that they should run services as there is no business case.

Car parks at local rail stations are more than 80% full, the point at which rail industry modelling dictates that they are full and deter people from using them.

The plans for more houses in Horsley are inappropriate. There is simply not the infrastructure in terms of roads, drainage, schools, medical facilities, transport etc etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18108  **Respondent:** 15705857 / GRH Hampshire **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The Wisley proposal will become a ghetto with limit access in and out. Suggesting that inhabitants would drive to Horsley to catch the train is unsustainable – the car park is full, as are the trains.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18109  **Respondent:** 15705857 / GRH Hampshire **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Stating that Horsley station can become a bus station is simply risible.
The A3 is full with no proposals to provide more road capacity
In fact the whole thing is risible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLP16/18106  Respondent: 15705857 / GRH Hampshire  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It prioritises development in green belt over brownfield sites.
It is skewed deliberately to the east of the borough away from more appropriate sites elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/2065  Respondent: 15705857 / GRH Hampshire  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is counter to Government policy on consultation. Consultations should be simple and easy to understand by ordinary people. Your document is too dense, full of detail and impossible to comprehend.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/2066  Respondent: 15705857 / GRH Hampshire  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The tactics of the Council bring it into disrepute. Insisting that this is a new plan so we all have to write in again is an abuse of the system.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4450  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that the Local plan does not effectively demonstrate proposals to improve road networks to accommodate the additional vehicles likely to travel through East and West Horsley. The majority of through roads are narrow, have pinch points and are subject to closure through flooding on a regular basis

1. LRN7 intends to introduce interventions to address potential highway performance issues resulting from the development of Wisley airfield. If these are those put forward by the developers they are likely to have a significant negative impact on East and West Horsley, or any traffic travelling to or through even without additional housing

2. LRN22 East and West Horsley traffic management and environmental improvement scheme is non specific and the suggested £1m is insufficient to make sufficient improvements to deal with the substantial traffic increase likely if all aspects of the local plan are allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4440  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I OBJECT to the 2016 local plan in its current format.** I do not believe that it is sound and is not yet fit for implementation.

1. The council relies on a strategic housing making assessment that is in question. The council have not scrutinised the figure provided and rely purely on the fact that other councils have used the consultant GL Hearn to assess the housing need. The SHMA appears to be exaggerated against ONS data. Two independent reviews have identified similar faults, which suggest that the figure is too high and inaccurate. They also identify that the recent referendum result relating to Europe may have an impact on economic growth and consequently should be reviewed. The SHMA must be reviewed to ensure that it is accurate before the housing figure is agreed.

2. The council have chosen not to impose any constraints in respect of the OAN.

3. The Council highlight that the borough is 89% greenbelt and yet proposes to build approximately 65% of new development on greenbelt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4442  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate increase in housing in West Horsley. The local plan proposes an increase of thirty-five percent for a rural village, this is totally out of character. The density suggested by the council is not in keeping with the current environment, almost double the levels within the majority of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4447  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that there is no provision for a larger primary school within East or West Horsley despite the fact that Para 38 NPPF states that for large developments a primary school should be built within walking distance. Over 500 houses within East and West Horsley is large development when considering the size of the villages. The Surrey infrastructure review does not state that a new school is necessary despite the fact that the school is already oversubscribed causing children to be driven to other villages. (They do state the school may in the future identify a suitable site through infill opportunities). Surrey have suggested that children from the Horsleys can be accommodated either in Ripley or Clandon; both of which would necessitate parents driving, and in the case of Ripley travelling through a traffic blackspot.

I OBJECT to the local plan making East and West Horsley less sustainable. This is breach of para 7 and 9 NPPF and policy S1 of the proposed local plan. Failing to provide essential health, education and community facilities forces residents to use private vehicles to reach these when at present the majority can walk. The Infrastructure survey suggests that primary and junior school aged children will have to travel to Ripley and Clandon to attend school. No provision is made for any other facilities including health, dental, community and sport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/4452  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the area described as West Horsley (south) being removed from the green belt. This clearly meets the description of a village that should be ‘washed over’ by the green belt in terms of size, appearance and character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8120  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In line with Central Government guidance I OBJECT to development on areas of high agricultural value. This includes Wisley airfield. If it is necessary to build on agricultural land it should be of low quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8126  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of A35 Wisley airfield in the local plan. The principle of the local plan is a presumption in favour of sustainable development. The Housing and Planning Act 2016 grants permission in principle to any development included within the local plan leaving only technical details to be considered by planning authorities. The site at Wisley failed in its planning application on a large number of points including infrastructure and sustainability. It is highly unlikely that these will be met in the future due to its positioning. Part of the site is green belt and no exceptional circumstances have been demonstrated. Aspects of the site also include high quality agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8125  Respondent: 15706689 / Hope Sarti  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of Policy A41 relating to land south of East Lane. This is in contravention of para 85 NPPF which states that borders must clear and readily recognised. The natural border is the wood to its east. The inclusion of this site is not in keeping with the current settlement and character of the village; houses front East Lane up the woods to the east of this site which borders the road for approximately 400 yards. The land is green belt, no exceptional circumstances are made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18171  Respondent: 15706689 / Hope Sarti  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the council failing to deliver sufficient infrastructure to cope with the proposed development within this area of the borough. The bus network is almost non-existent and new buses are linked only to the Wisley development. The train station car-parks at Horsley and Effingham junction are always full and there is no space to enlarge them. The roads are not suitable for commuters to cycle any distance due to the narrowness of the roads, speed of traffic and lack of space to build cycle paths.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18160  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to altering the green belt boundaries. Para 83 NPPF states green belt boundaries can only be altered in exceptional circumstances and where there is local support. Meeting the housing need is not exceptional circumstances. This has recently been reiterated by Central Government. No exceptional circumstances have been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18163  Respondent: 15706689 / Hope Sarti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount of development in this small area of the borough; The area surrounding East and West Horsley will attract in excess of 5000 new homes, which accounts for over thirty-six percent of development. The area is predominantly rural in structure, nature and environment and does not have the infrastructure to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8062  Respondent: 15706785 / Yasmin Nabe  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development at Slyfield which omits to show improved road systems and would lead to traffic gridlock.

The full consequences of the proposed local plan are enormous and are only now emerging. For example, even if all the proposed highway improvements in the Plan were built, congestion would not improve. We would just have a lot more people stuck in traffic and traffic would get a very great deal worse to start with. In our area, Stoke next Guildford changes we would be likely to experience include:

- the expansion of Guildford along the A3. Development of 2000 homes on Gosden Hill, by Burpham, is a particular local concern
- more traffic from the major development sites coming in on the Stoke Intersection and London Roads
- roads near us, such as Stoke Rd, and York Road, being even busier due to other more central routes being closed to through traffic, pedestrianised or used for development
- pressure for high density development eroding character in our area

It is a matter of choice by our Council that Guildford would expand on this scale. Many residents were prepared to support our Council in the need for some sensitive, measured expansion. However the scale of what is proposed is far from this.

Other Councils are applying “constraints” to their overall housing number. This is allowed. By contrast, Guildford is proposing to release so much land for development that we could end up being asked to meet housing need for neighbouring towns. We find ourselves in the bizarre situation where it is suggested we sacrifice our countryside in order to protect countryside around Woking.

Please do not let this local plan go ahead in its present from.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
by Compton, Worplesdon and Wanborough Parish Councils) has identified most of the development site as meeting the criteria for an Area of Outstanding Natural Beauty (AONB). The study will now be forwarded to Surrey CC/Natural England with a request that Blackwell Farm is included as a candidate area in the forthcoming AONB boundary review. The PCs were prompted to do this when it was brought to their attention that Blackwell Farm had been omitted from Surrey CC's landscape evaluation on behalf of Surrey Hills AONB Board (despite a previous study suggesting that it was likely to meet AONB criteria and merited assessment)

**Transport survey for A26 Blackwell Farm.**

Compton PC and Compton Village Association have jointly commissioned a Technical Note by traffic consultant RGP to look at the implications of the Blackwell Farm development, and the proposed new link road from the A31. The results show:

- The road infrastructure costs associated with providing a new route into Guildford from the west (linking the A31 to the Tesco roundabout) are far in excess of what has been estimated in the Local Plan and would not justify a development of this size. The scheme is therefore economically unviable.
- The new 4-way junction proposed at Down Place on the A31 would require more land-take than the Local Plan has suggested - it would involve widening the A31 bridge over the A3. No money has been allocated for this bridge-widening scheme and there is no indication that Highways England has approved it. Given the traffic flows, it is more likely that a large roundabout would be needed at this junction and this would severely impact the Surrey Hills Area of Outstanding Natural Beauty.
- The new highway scheme, which provides access to Blackwell Farm, will increase congestion on the A31, B3000, and at the Gill Avenue/Egerton Road junction, which serves the A&E unit at the Royal Surrey County Hospital.

All the options for vehicles coming from the A3 north into the site would result in an increase of traffic manoeuvring through junctions that have poor accident records (eg Puttenham Interchange). No transport infrastructure requirements for the site have been identified to address the u-turning problem on the A31 (although we know SCC is trying to close the East Flexford gap).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Inaccurate evidence on SNCIs.

In the Settlement Profiles document (2013) which is part of the Settlements Hierarchy referred to in the Evidence Base (Appendix D of the Plan) GBC state (page 49) “There is a Site of Nature Conservation Importance (SNCI) to the north of Normandy” whereas in fact there are four (and possibly even five) SNCIs to the north of Normandy namely: Withybed Copse and Henley Park Fields SNCI, Normandy Common SNCI, Wyke School Wood SNCI, and Wyke Churchyard SNCI, and arguably part of Wanborough and Normandy Woods SNCI.

In addition to these, there are two others in Normandy Parish, namely Little Flexford SNCI (which is directly affected by Policy A46), and Broadstreet Common and Backside Common SNCI, as well as the remainder of Wanborough and Normandy Woods SNCI.

I believe that this is important evidence that has been missed and, had it been included correctly, A46 and A47 would not have been included in the plan.

With reference to Policy 12, the Plan has been developed without due assessment of the implications to local highways of the proposed development under policy A46.

Surrey County Council traffic simulations verify that the level of traffic on the local roads is already above capacity the roads were designed for. With no evidence of secure funding for any improvements to the A3 during the life time of the Plan the local road network will be even more affected. The local road network is incapable of coping with the development of the scale proposed in A46, and there is no evidence that this has been consider, nor that provisions for improvement in the plan period are feasible or viable.

I understand the GBC plans to build a tunnel to ease traffic congestion along the A3, however, it will not be completed during the life span of this Local Plan.

I believe that this is important evidence which is correctly assessed would have meant that A46 would not have been included in the plan.

Flood risks have not been considered by GBC

As A46 is within 5km of the Thames Basin Heaths Special Protection area (TBHSPA), (Policy 1: Sustainable Development) GBC should have considered the Habitats Regulations (NPPF) ‘water stress’. Yet this has not been considered. GBC’s Surface Water Management Plan (SWMP) has excluded the land north of A46, flood risk 3a and 3b (identified on the Environmental Agencies flood risk map). Loss of 3b an ‘effective floodplain’ will severely impact on the surrounding areas identified on the SWMP.

I believe that this is important evidence which is correctly assessed would have meant that A46 would not have been included in the plan.

The existing SPA Avoidance Strategy 2009-2014 was already extended to 2016 but has not been completely reviewed. The needs of the SPA cannot be assessed against the proposals brought forward under the Local Plan without this being completed.

The Guildford Open Space, Sport and Recreation Assessment document was also produced too late to be properly considered in relation to the proposed sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With reference to Policy A46 the ‘needs and priorities’ for Normandy and Flexford have not been decided by the residents, as local residents have not been consulted early enough in the process. The National Planning policy Framework (NPPF) 155 states, ‘early and meaningful’ engagement and collaboration with neighbourhoods and local organisations is essential. This has not happened. I understand that evidence is available that documentation for A46 was submitted on behalf of Taylor Wimpey to GBC Planning Policy at least two years ago. However, this has not triggered any meaningful local resident consultation until now.

I object to policy A46 on the grounds that local residents have not been consulted sufficiently on this proposal, as required under the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

The national and local policies on biodiversity and the natural environment listed below all make strong statements about the need to minimise the impact of development on biodiversity and to conserve the natural environment.

*The National Planning Policy Framework*

The National Planning Policy Framework (NPPF) states that “The purpose of planning is to help to achieve sustainable development” and it describes three “dimensions” relevant to this aim: economic, social and environmental. The explanation for how the environmental aspect plays a role includes the statement “…..helping to improve biodiversity, use natural resources prudently….,” (see point 7 of the section in the NPPF dealing with achieving sustainable development).

In section 11 headed “Conserving and enhancing the natural environment”, it is stated inter alia that planning policy should protect and enhance valued landscapes and minimise impacts on biodiversity, providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations….”.

*Guildford Borough Council*

Guildford Borough Council (GBC) interprets the NPPF through their 'Policy I4' which emphasises the commitment to biodiversity stating: "The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)".
Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA’s objectives. The Supplementary Planning Document (SPD) will set out guidance on how this can be achieved. European sites designated as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), National Sites of Special Scientific Interest (SSSIs), local SNCIs and Local Nature Reserves are all shown on the Policies Map or as subsequently updated.

Policy 14 goes on to say that "Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity."

The UK Biodiversity Action Plan

The UK Biodiversity Action Plan (UK BAP) describes the UK’s biological resources. In Surrey recognised priority habitats include lowland dry acid grassland, lowland meadows, flood plain grazing marsh, wet woodland, hedgerows and arable field margins. It is known that farmland offers important habitat for wildlife. The UK BAP also identifies priority species for conservation which include rare and also declining “species of mammals, birds, reptiles, amphibians, fish, plants, mosses, lichens and fungi”. Examples of priority species in Surrey include farmland birds which should be protected from further decline by maintaining and enhancing current populations wherever possible. As it says: “Development could impact on these species by direct loss of habitat, but also through increased recreational disturbance, especially associated with residential developments.”

The proposed area for development in Normandy and Flexford encompasses many of the above biological resources, recognised priority habitats and priority species for conservation. It is also relevant to the Biodiversity Plan for Surrey (see 2.4 below).

The Biodiversity Plan for Surrey

The Biodiversity Plan for Surrey (BPS) incorporates changes brought about by the NPPF, identifies the importance of Ancient Woodland and veteran trees for biodiversity interest. Such habitats support woodland plants with limited dispersal abilities, mammals such as bats and dormice which are protected species, as well as woodland birds and butterflies (many of which are in decline nationally), invertebrates and often lichen, mosses and fungi.

It is clear that the proposals for development in Normandy and Flexford (A46 and A47) directly conflict with these policies and I object to these development proposals as GBC have failed to show how they will conserve and enhance biodiversity.

Objection to Policy A46 on the grounds that GBC have failed to take into consideration the impacts upon wildlife and habitats both within the proposed development site and in SSSI’s and SNCI’s in the surrounding area in breach of Section 11 of the NPPF

Impact on the wider environment of the Thames Basin Heaths Special Protection Area

I believe that the Plan is unsound in relation to Policy A46 as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact that this huge proposed development specifically will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The proposed development is considerably less than five kilometres away from the TBH SPA and not much beyond the 400m exclusion zone, occupying an area between under 1km, to just over 2km, from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. Furthermore, Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals (including dogs being exercised).

I therefore question whether enough - or indeed any - consideration been given to the potentially detrimental effect that the proposed strategic development between Normandy and Flexford will have on this internationally important site.
A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. Two hundred and sixty-four dogs are likely to come with the proposed development, the current ratio of dogs per household being 24/100, so this could potentially attract between 26 and 132 extra dog-walkers a day.

To deter dog-walkers from visiting the TBH SPA, any Suitable Alternative Green Space (SANG) in the proposed development would have to be of exceptional quality, as the Nightingale Road and Dolley's Hill entrances to the TBH SPA are only either 5 minutes away by car, or 20 minutes on foot. Whatever the size, the SANG would be a very small area in which to exercise 264 dogs. A small number of irresponsible dog owners, who do not scoop the poop, will make such a small area unattractive for walk and play. This is already a problem on Normandy Common.

Another factor is that some areas where a SANG might be located are muddy in wet weather and throughout the winter, whereas many of the tracks on the TBH SPA are dry in wet weather, including the winter. For those dissatisfied with the proposed SANG for whatever reason, or those wanting a longer walk, the natural alternative is the TBH SPA. If only 10% of dog owners use the TBH SPA, there would be 26 extra dogs a day using the TBH SPA; if 50% do, it would be an extra 132 dogs a day.

I strongly believe, that given the proximity of the proposed development to two entrances to the TBH SPA it will be impossible to design a SANG that will deter many residents from using the TBH SPA to walk their dogs. This will have a very serious impact on the wildlife and overall environment (unique flora and fauna) of this internationally important area.

Natural England states: “Special Areas of Conservation (SACs) are European designated sites, they are afforded protection under the Conservation of Habitats and Species Regulations 2010. Generally speaking, when considering the impacts upon European sites, the Local Planning Authority, under the provisions of the Habitat Regulations, should have regard for any potential impacts that a plan or project may have”.

‘Natural England disagrees with the conclusions reached by the Habitat Regulation Assessment (HRA) and Sustainability Appraisal (SA) and advise that the plan is unsound on this basis’. Natural England states further: “We also have concerns that the Council does not appear to have adopted Government planning policy set out at paragraph 14 of the National Planning Policy Framework (NPPF) stating that local plans should meet objectively assessed development needs unless specific policies in the NPPF (such as protecting designated wildlife sites and landscapes) indicate development should be restricted.”

The Habitats Regulation Assessment document is incorrect. In Section 18 Policies 9, 10, and 13 are assessed but not the policies proposed in this version of The Plan.

I therefore object to the proposed A46 on these grounds.

**Impact of increased volumes of traffic on wildlife**

If the proposed development goes ahead, there will be an increase in pollution with respect to air quality, noise and light levels, particularly where cars have to queue at junctions or obstructions. The transport strategy proposed by GBC for this strategic site contains no scheduled improvements for Glaziers Lane and very few for Westwood Lane, both rural lanes. The A323 to the north of the site will also be affected, and very few improvements to that road are planned.

This will affect not only the people living in the area but also local wildlife. Natural England addressed this issue in: 'The ecological effects of air pollution from road transport' (2016) which states that: "Biodiversity 2020 identifies air pollution as a direct threat to biodiversity in England. Many habitats of nature conservation importance in the UK are adapted to low nutrient conditions and/or are vulnerable to acidification, and are sensitive to additional airborne nitrogen oxides (NOx), sulphur dioxide (SO2) and ammonia (NH3), as well as to nitrogen deposition and acid deposition." In addition, noise from traffic can result in hearing loss in animals. It masks important environmental clues and animal signals. It can result in stress and induce behavioural effects, such as abandonment of territory. With regard to light, predators use light to hunt, and prey species use darkness as cover. Thus increased light at night alters the predator/prey balance and can also affect breeding behaviour in many species.

The environment and the wildlife in and around the four designated SNCIs on the A323 in Normandy i.e. Wyke Churchyard SNCI, Normandy Common SNCI, Wanborough and Normandy Woods SNCI (northermost wood) and Wyke...
School Woods SNCI, all of which border the road, will be adversely affected by increased traffic and associated pollution. The UK BAP Traditional Orchard Habitat in Glaziers Lane will also be affected.

Another road where traffic will also be significantly increased is the A324. This borders the TBH SPA and increased traffic and pollution will therefore have an adverse effect on the heathland.

The increase in volume of traffic resulting from the proposed A46 development will reduce biodiversity and harm wildlife. The transport strategy for the area does nothing to mitigate for this and does little to reduce the number of additional motorised vehicles on the roads around the site. I therefore object to the proposed A46 on these grounds.

**Impact of the proposed density of housing and Policy D4**

A large development such as proposed for site A46, with urban housing density, will impact significantly on wildlife within the ancient woodland and veteran trees on the site. The damage to both the environment and its wildlife would be immeasurable regardless of whether buffer zones are put in place.

Not only would the woodland wildlife on the site be harmed, but also wildlife in the woodland next to the site, i.e. the North end of Walden's Copse and Pussey's Copse. Furthermore, it is very important not to break the canopy in any of the existing connections between these woodlands for fear of wildlife isolation. Dormice, for example, do not often like to come down to the ground preferring to move through the canopy.

With the proposed development will come cars, noise, light and air pollution all of which are hazardous to wildlife. As well as increased human activity, there are likely to be approximately 187 extra cats in the area, cat ownership currently being 17 out of 100 households, together with a large number of dogs (see section 2.4.1. above). These animals would undoubtedly have a serious impact on the wildlife of the woodland areas no matter how well the woodland are protected by fencing for example (it is well known that people cut fencing to facilitate access).

The elimination of farmland on site A46, which has traditionally been used for grazing, would also be disastrous since it provides habitat for a variety of wildlife including hedgehogs (which are seriously in decline), bats, owls, and woodpeckers. The open fields are important hunting grounds for barn owls, which can only hunt over open space, and birds of prey such as red kite, buzzard and kestrel. Bats have been seen to hunt by the avenue of ancient oaks and on the wooded edges.

At present, the majority of houses in the villages of Normandy and Flexford have fairly large gardens, which support large numbers of wildlife species. The increased density in housing will come with gardens of much reduced size. There is also a trend in such housing developments for areas to be paved over for parking. Taken together, this would result in a further reduction in the amount of green space, and the value of the gardens for wildlife declines.

GBC are of the opinion that the size of garden is irrelevant when it comes to maintaining biodiversity (see answer given by GBC to question 26 at the meeting organised by Normandy Parish Council on 24 February 2016). This is incorrect. According to an internet article compiled by Ken Thompson and Steve Head, entitled 'Gardens as a resource for wildlife' (Wildlife Gardening Forum) it has been shown that total vegetation is a major determinant of diversity and abundance of wildlife. In this article the potential national significance of gardens as a resource for wildlife is clear, but that as garden size decreases, the area occupied by trees, hedges and tall shrubs also declines, with a resulting decline in biodiversity.

Policy D4 anticipates that new possible development sites will be proposed in inset villages (which will include Normandy and Flexford if the Plan is adopted) in addition to current site locations. Whilst they state that they aim to protect the important character of these inset villages using other development management policies, it is inevitable that any such development, if granted, will further increase housing density, with greater impacts on wildlife (as above).

GBC state in the Plan that they have a responsibility to use natural resources, such as land, wisely. They are of the view that increasing densities of housing is one such wise use of land, because it makes development more sustainable. However they fail to take account of the impact of such development on wildlife and the environment, both within the proposed development site and on statutory and non-statutory designated sites in and around Normandy and Flexford. I therefore object to the development proposed on Site A4 on these grounds.

The majority of the site covered by this part of the development is designated as an SNCI and lies within an area identified as a ‘Water Vole Alert Area’ as identified by the National Water Vole Database and Mapping Project in 2012.
It is shocking that GBC would ever consider an SNCI a suitable site for development, particularly given the statements in the NPPF (Para 109) and the Council's own Policy I4 as set out in section 2.1 and 2.2 above. We find it a telling insight into the very low value that GBC places on biodiversity and wildlife. I strongly object to policy A46 on these grounds.

2.6 I object to Policy A46 on the grounds that there is no proven need for a secondary school in Site A46. Secondary schools to the west of the Borough are under subscribed by 736. Another 480 places will be available at the new Technical College (2018) and there are approved expansions at Guildford County and St. Peters. The New Hoe Valley school will have 120 places available per year, 25 places this year not taken.

The Land Availability Assessment (LAA) projections show there will be no identified ‘need’ for a school for the first 5 years of construction of 450 homes. An application for housing and a secondary school has been submitted for the development at Rokers, Worplesdon.

There has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the “exceptional circumstances” test. GBC’s assessment of alternative secondary school sites notes that Surrey County Council’s concerns as to remoteness of the site from development areas was only overcome by the new housing provision in the Local Plan – i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

2.7 Lack of consistency of approach on ‘Sustainability’ versus ‘Sensitivity’

Two of the key concepts that underpin the Plan are ‘sustainability’ (i.e. an areas suitability for development - Policy 1) and ‘sensitivity’ (its importance in terms of protecting the Green Belt). Individual settlements are ranked on both counts, and development is favoured in the most ‘sustainable’ ones; conversely, the barrier is higher in the most ‘sensitive ’ones. What is significant is that for the purposes of assessing ‘sustainability’ Normandy and Flexford’ have been treat as one settlement, whereas for ‘sensitivity’ they have been treated separately. This is simply inconsistent. In fact the original data (used in the first consultation) identified Normandy as one settlement. The data was rewritten in 2014 dividing the settlements in two. It is not appropriate to alter data in this way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/8068</th>
<th>Respondent:</th>
<th>15709153 / Heather Sohl</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
The Local Plan 2014 did not propose site A46 be allocated for development. Since then there has been no further Green Belt review, but there has been a Green Belt Purposes Assessment which identified this site as particularly sensitive in Green Belt terms.

I object on the grounds that A46 was not proposed or considered as a strategic site in the first consultation of the Local Plan. In conclusion, I feel strongly that the draft Local Plan does not meet sufficient standards to justify the proposed development at Sites A46 and A47, as detailed above, and therefore object to this Local Plan. Thank you for taking my comments into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPS16/8066  Respondent: 15709153 / Heather Sohl  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A46 and A47 both fall within the Green Belt, but their inclusion here is not justified. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF states ‘the essential characteristics of Green Belts are their openness and their permanence’ (NPPF). Past verdicts of planning inspectors have declared that Normandy/Flexford green fields (A46) contribute to the ‘openness’ of the Green Belt and a panoramic view of green fields to the Surrey Hills AONB.

Paragraph 4.3.1.2 of the Plan (under Policy P2) states that "only those villages whose open character makes an important contribution to the Green Belt should be included in the Green Belt". I contend that the land in both Policy A46 and A47 makes an unparalleled contribution to the Green Belt which stretches from Guildford in the east to Ash/Tongham in the west. If this area is inset and built upon in the manner proposed it will be the beginning of urban sprawl across this stretch of countryside which Green Belt policy was designed to prevent. The Government have indicated that Green Belt is supposed to be protected, but GBC are trying to justify development in this area when they themselves designated it as having a 'Red' status under their system for quantifying sensitivity (red being the most sensitive and least likely to be developed). GBC have totally ignored all policies on biodiversity when proposing to inset these areas.

New developments are supposed to maintain existing Green infrastructure and improve upon it; in order to secure sustainable development, there should be a net gain for biodiversity. It is impossible to agree that any Green infrastructure which would accompany this development could mitigate for the habitat loss and resultant decline of species.

According to the Council for Protection of Rural England (CPRE), 13% of the most important habitat areas identified in UK BAP occur in the Green Belt, and certain species such as the mistle thrush, song thrush and starling (known to use Site 46) are doing better in the Green Belt than in any other parts of England. Green Belt areas also show more positive trends of bird and butterfly species than in the urban fringes compared to them.

I object to the insetting of Normandy and Flexford (re: Policies A46 and A47) from the Green Belt on the grounds that these areas do contribute to 'openness of the Green Belt'.

---
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2910</th>
<th>Respondent: 15709153 / Heather Sohl</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of site A46 from the Local Plan. My previous submission to the Local Plan 2016 included reasons for my objection to the inclusion of this site, as there would be significant biodiversity loss if this development had proceeded, including to the Special Protection Area of the Thames Heaths Basin.

I support the removal of site A47 from the Local Plan. Again, I had objected previously to the inclusion of this site in Local Plan 2016, mainly on the grounds of biodiversity loss given that this is a designated Site of Nature Conservation Importance and therefore of high local wildlife value.

For both of these sites (A46 and A47) the reason for removal from the Local Plan was stated as being because no exceptional circumstances existed to remove this “high sensitivity” land from the Green Belt. This, again, provides greater evidence to the first point in this letter, from the Guildford Borough Council’s own documented rationale, that the insetting of the Green Belt at Flexford and Normandy is completely unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2912</th>
<th>Respondent: 15709153 / Heather Sohl</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of site A46 from the Local Plan. My previous submission to the Local Plan 2016 included reasons for my objection to the inclusion of this site, as there would be significant biodiversity loss if this development had proceeded, including to the Special Protection Area of the Thames Heaths Basin.

I support the removal of site A47 from the Local Plan. Again, I had objected previously to the inclusion of this site in Local Plan 2016, mainly on the grounds of biodiversity loss given that this is a designated Site of Nature Conservation Importance and therefore of high local wildlife value.
For both of these sites (A46 and A47) the reason for removal from the Local Plan was stated as being because no exceptional circumstances existed to remove this “high sensitivity” land from the Green Belt. This, again, provides greater evidence to the first point in this letter, from the Guildford Borough Council’s own documented rationale, that the insetting of the Green Belt at Flexford and Normandy is completely unjustified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1324 Respondent: 15709153 / Heather Sohl Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a Guildford Borough Council resident, living in the Normandy/Flexford area. I have some strong objections to the Guildford Borough Council (GBC) Proposed Submission Local Plan: Strategy and Sites (2017) (Reg 19) including changes made since the last draft.

I strongly object to the changes in policy P2. Green Belt is, amongst other things, vital to protecting our natural countryside from urban sprawl, and should not be removed from areas without proper evidence to support “exceptional circumstances” (as per National Planning Policy Framework (NPPF) para. 89). To suggest in the proposed changes that new areas - Normandy settlement, Flexford settlement and Walden Cottages - be inset from the Green Belt is in fact completely contradictory to the evidence that exists:-
- Past planning appeals APP/Y3615/W/15/3002308, APP/Y2615/A/10/2140630 and APP/Y3615/A/10/2131590 contained such evidence that these areas contribute to the openness of the Green Belt.
- The Sustainability Appraisal para. 10.4.7 contains evidence that the agricultural land affected contributes to the ‘openness’, is of Best and most Versatile (BMV) quality and contributes to the local rural economy.
The applicable land at Flexford and Normandy is also visible from the Surrey Hills Area of Outstanding Natural Beauty (AONB), so the loss of this area, and thus the countryside, by insetting it in the Green Belt would affect the views into and from the AONB.

I am concerned and object to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) that Normandy, Flexford and 12 other villages are “now inset from the Green Belt". This is extremely inaccurate, as the proposed changes are just that, proposals only, with no decision having been made to this end and therefore these areas still remain within the Green Belt.

There is no percentage of loss of land in the Green Belt which would be considered acceptable as stated in the NPPF or elsewhere. It is concerning that the plan claims to lose only 1.6% of the borough’s Green Belt, when in fact if measuring this accurately it would be closer to 7% when one considers all of the insetting, infilling and settlement boundary extensions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4410 Respondent: 15710017 / Clive Long Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Revised Guildford Borough Draft Local Plan 2016**

It appears that very little of substance has changed from the first unacceptable Draft Plan of 2014. I write to register my objections and criticisms of certain key aspects of the above Plan, as follows:

- The blanket withdrawal from the Green Belt of West and East Horsley, as well as all the other villages listed, is overreaching and excessive. If it is necessary to designate some very specific small patches of land for inset from the Green Belt for development, it should only be done with considerable care on a site by site basis, not sweeping wholesale removal of large swathes of whole Parishes and villages.
- The policy statements essentially contradictory, claiming to protect the Green Belt but then removing huge areas from its protection.
- The number of additional potential dwellings proposed in West Horsley is disproportionate compared to the existing housing stock and will constitute a massive increase of some 35% and in no way can be considered “commensurate to their size, character and function”.
- The number of additional potential dwellings in West Horsley is considerably higher and disproportionate to that proposed for the rest of the Borough.
- The population growth projections used in the Plan appear to have a fundamental base calculation flaw to justify these huge housing increases. They are considerably higher than predictions made by the Office for National Statistics. Why? They are therefore an unreliable basis to warrant such considerable development.
- In addition, following the Brexit referendum outcome, housing needed for EU immigrants will be much less.
- The proposed additional housing for the Horsleys must not be viewed in isolation but must be considered in the context of the potential other developments in the Borough, particularly the massive expansion of over 2000 houses at Wisley Airfield, a mere couple of miles away. The area will be literally swamped by a massive increase in population which is in no way “commensurate”.
- Successive national Governments and Ministers are on record as confirming that the Green Belt should remain protected and only used in “exceptional circumstances” and housing development needs does NOT constitute exceptional circumstances.
- The proposed extremely high proportion of affordable housing in these housing developments is totally out-of-line with the current mix of housing. Furthermore it is questionable if there is even demand for such a high proportion.
- The local infrastructure of facilities and services such as schools, medical facilities, roads, will be overwhelmed.
- The adoption and conversion of most pavements to shared use for both pedestrians and cyclists, with pedestrians having priority where necessary, should be specifically stated in the Draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to note my objection to the proposed plan for development for certain part of the Horsley area.

I am a Horsley resident and home owner. One of the main reason for choosing to live in this area was and still is to take full advantage of quiet village life and to enjoy the green space which is entrenched in the declaration of much of this area as a green belt.

I am disappointed that application has been made by the Guildford Council to ‘delink’ Horsley from the green belt so that housing and development can be increased in this area. Horsley is an essential part of the green belt and is part of the Surrey Hills and part of this area of outstanding natural beauty. It is also close enough to London to be a great area to easily access by Londoners keen to introduce their families to nature either walking in the various green areas of cycling along country lanes. There appear to be no good or exceptional reasons, as required by the Policy to change the boundaries of the green belt. Any such change would also add significant impact on the enjoyment of the area.

The addition of so many more homes will have a significant impact on the services in the area. Not only would the planned additional Housing change the character of the village but there are no plan for how the additional Services will be provided.

There is no concrete plan for infrastructural development to accompany the proposed increase in housing. The train station parking is already inadequate for present commuters and is often full. No plan exists for the development of new schools although the population increase would require it. The roads around Horsley are country lanes and would not be able to cope with further traffic.

All in all the proposed development is not well considered or thought out and will have a very negative impact on the character of the area without enough consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Errors and omissions need to be corrected and significant late evidence should be properly considered when making such important judgements. Arguments made based on flawed, inaccurate or inadequate evidence cannot be valid.

Specifically:

- Surrey County Council’s Strategic Highway Assessment and Guildford’s Borough Transport Strategy were both produced very late in the process and their content is not and cannot have been fully taken into account in the production of the Local Plan. Infrastructure capacity, condition and future changes / funding are key to making decisions in the Local Plan and these issues appear weak in the Proposed Submission Local Plan in relation to the proposed Sites.
- The Guildford Open Space, Sport and Recreation Assessment document was also produced too late to be properly considered in relation to the proposed sites.
- The Settlement Hierarchy and Settlement Profile for Normandy / Flexford states that “there is a Site of Nature Conservation Importance (SNCI) to the north of Normandy”. There are actually several SNCIs in Normandy, including south of Normandy within the allocated A46 site.
- The existing SPA Avoidance Strategy 2009-2014 was already extended to 2016 but has not been reviewed for the future. The needs of the SPA – arguably one of the most important protected sites in southern England – cannot be assessed against the proposals brought forward under the Local Plan without this being completed.

I believe that Sites A46 and A47 could not be included in the draft proposals if the evidence were correct and properly assessed.

Lack of consistency of approach on ‘Sustainability’ versus ‘Sensitivity’

Two of the key concepts that underpin the Plan are ‘sustainability’ (i.e. an area’s suitability for development - Policy 1) and ‘sensitivity’ (its importance in terms of protecting the Green Belt). Individual settlements are ranked on both counts, and development is favoured in the most ‘sustainable’ ones; conversely, the barrier is higher in the most ‘sensitive’ ones. What is significant is that for the purposes of assessing ‘sustainability’ Normandy and Flexford have been treated as one settlement, whereas for ‘sensitivity’ they have been treated separately. This is simply inconsistent. In fact the original data (used in the first consultation) identified Normandy as one settlement. The data was rewritten in 2014 dividing the settlements in two. It is not appropriate to alter data in this way.

In conclusion, I feel strongly that the draft Local Plan does not meet sufficient standards to justify the proposed development at Sites A46 and A47, as detailed above, and therefore object to this Local Plan. Thank you for taking my comments into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Impact of increased volumes of traffic on wildlife

If the proposed development goes ahead, there will be an increase in pollution with respect to air quality, noise and light levels, particularly where cars have to queue at junctions or obstructions. The transport strategy proposed by GBC for this strategic site contains no scheduled improvements for Glaziers Lane and very few for Westwood Lane, both rural lanes. The A323 to the north of the site will also be affected, and very few improvements to that road are planned.

This will affect not only the people living in the area but also local wildlife. Natural England addressed this issue in: 'The ecological effects of air pollution from road transport' (2016) which states that: “Biodiversity 2020 identifies air pollution as a direct threat to biodiversity in England. Many habitats of nature conservation importance in the UK are adapted to low nutrient conditions and/or are vulnerable to acidification, and are sensitive to additional airborne nitrogen oxides (NOx), sulphur dioxide (SO2) and ammonia (NH3), as well as to nitrogen deposition and acid deposition.” In addition, noise from traffic can result in hearing loss in animals. It masks important environmental clues and animal signals. It can result in stress and induce behavioural effects, such as abandonment of territory. With regard to light, predators use light to hunt, and prey species use darkness as cover. Thus increased light at night alters the predator/prey balance and can also affect breeding behaviour in many species.

The environment and the wildlife in and around the four designated SNCIs on the A323 in Normandy i.e. Wyke Churchyard SNCI, Normandy Common SNCI, Wanborough and Normandy Woods SNCI (northernmost wood) and Wyke School Woods SNCI, all of which border the road, will be adversely affected by increased traffic and associated pollution. The UK BAP Traditional Orchard Habitat in Glaziers Lane will also be affected.

Another road where traffic will also be significantly increased is the A324. This borders the TBH SPA and increased traffic and pollution will therefore have an adverse effect on the heathland.

The increase in volume of traffic resulting from the proposed A46 development will reduce biodiversity and harm wildlife. The transport strategy for the area does nothing to mitigate for this and does little to reduce the number of additional motorised vehicles on the roads around the site. I therefore object to the proposed A46 on these grounds.

Impact of the proposed density of housing and Policy D4

A large development such as proposed for site A46, with urban housing density, will impact significantly on wildlife within the ancient woodland and veteran trees on the site. The damage to both the environment and its wildlife would be immeasurable regardless of whether buffer zones are put in place.

Not only would the woodland wildlife on the site be harmed, but also wildlife in the woodland next to the site, i.e. the North end of Walden's Copse and Pussey's Copse. Furthermore, it is very important not to break the canopy in any of the existing connections between these woodlands for fear of wildlife isolation. Dormice, for example, do not often like to come down to the ground preferring to move through the canopy.

With the proposed development will come cars, noise, light and air pollution all of which are hazardous to wildlife. As well as increased human activity, there are likely to be approximately 187 extra cats in the area, cat ownership currently being 17 out of 100 households, together with a large number of dogs (see section 2.4.1. above). These animals would undoubtedly have a serious impact on the wildlife of the woodland areas no matter how well the woodland are protected by fencing for example (it is well known that people cut fencing to facilitate access).

The elimination of farmland on site A46, which has traditionally been used for grazing, would also be disastrous since it provides habitat for a variety of wildlife including hedgehogs (which are seriously in decline), bats, owls, and woodpeckers. The open fields are important hunting grounds for barn owls, which can only hunt over open space, and birds of prey such as red kite, buzzard and kestrel. Bats have been seen to hunt by the avenue of ancient oaks and on the wooded edges.

At present, the majority of houses in the villages of Normandy and Flexford have fairly large gardens, which support large numbers of wildlife species. The increased density in housing will come with gardens of much reduced size. There is also
a trend in such housing developments for areas to be paved over for parking. Taken together, this would result in a further reduction in the amount of green space, and the value of the gardens for wildlife declines.

GBC are of the opinion that the size of garden is irrelevant when it comes to maintaining biodiversity (see answer given by GBC to question 26 at the meeting organised by Normandy Parish Council on 24 February 2016). This is incorrect. According to an internet article compiled by Ken Thompson and Steve Head, entitled 'Gardens as a resource for wildlife' (Wildlife Gardening Forum) it has been shown that total vegetation is a major determinant of diversity and abundance of wildlife. In this article the potential national significance of gardens as a resource for wildlife is clear, but that as garden size decreases, the area occupied by trees, hedges and tall shrubs also declines, with a resulting decline in biodiversity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8074  Respondent: 15710369 / Steve Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC state in the Plan that they have a responsibility to use natural resources, such as land, wisely. They are of the view that increasing densities of housing is one such wise use of land, because it makes development more sustainable. However they fail to take account of the impact of such development on wildlife and the environment, both within the proposed development site and on statutory and non-statutory designated sites in and around Normandy and Flexford. I therefore object to the development proposed on Site A4 on these grounds.

I object to Policy A46 on the grounds that there is no proven need for a secondary school in Site A46

Secondary schools to the west of the Borough are under subscribed by 736. Another 480 places will available at the new Technical College (2018) and there are approved expansions at Guildford County and St. Peters. The New Hoe Valley school will have 120 places available per year, 25 places this year not taken.

The Land Availability Assessment (LAA) projections show there will be no identified ‘need’ for a school for the first 5 years of construction of 450 homes. An application for housing and a secondary school has been submitted for the development at Rokers, Worplesdon.

There has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the “exceptional circumstances” test. GBC’s assessment of alternative secondary school sites notes that Surrey County Council’s concerns as to remoteness of the site from development areas was only overcome by the new housing provision in the Local Plan – i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in
this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8075  Respondent: 15710369 / Steve Marshall  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Impact of Policy A47

The majority of the site covered by this part of the development is designated as an SNCI and lies within an area identified as a ‘Water Vole Alert Area’ as identified by the National Water Vole Database and Mapping Project in 2012.

It is shocking that GBC would ever consider an SNCI a suitable site for development, particularly given the statements in the NPPF (Para 109) and the Council's own Policy I4 as set out in section 2.1 and 2.2 above. We find it a telling insight into the very low value that GBC places on biodiversity and wildlife. I strongly object to policy A46 on these grounds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17931  Respondent: 15710369 / Steve Marshall  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4 anticipates that new possible development sites will be proposed in inset villages (which will include Normandy and Flexford if the Plan is adopted) in addition to current site locations. Whilst they state that they aim to protect the important character of these inset villages using other development management policies, it is inevitable that any such development, if granted, will further increase housing density, with greater impacts on wildlife (as above).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **Legal compliance and soundness**

I object to the proposed Local Plan on the grounds that numerous factors make it non-compliant legally and unsound.

The Local plan proposals for A46 and A47 are inadequate on all the following grounds:

- The NPPF demands that residents are actively engaged in deciding their needs and priorities. This has not been met. These previously safeguarded proposals have been brought forward in detail only in this iteration of the plan, meaning residents have had only a minimal time to respond and only in relation to Regulation 19, not at Regulation 18. Even at a public meeting on 24th February with Cllr Spooner the position presented was that the safeguarding on A46 had been lifted and that the site was a ‘red rated’ green belt area. No mention was made of either proposal – only a few weeks before the new draft was published. I understand the proposals have been with GBC for up to two years.

I object that residents have not been fully consulted on these proposals.

- The proposals are contrary to the NPPF’s requirements on biodiversity and the natural environment. In section 11 headed “Conserving and enhancing the natural environment”, it is stated that planning policy should protect and enhance valued landscapes and minimise impacts on biodiversity, providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations…..”. GBC is failing to do this in several ways in relation to A46 and A47 with no clear justification or evidence given as to why this is the case. It seems that no consideration has been given to the value of the existing SNCIs, the wider network of hedges and trees and the fact that all this is within one of Surrey’s Biodiversity Opportunity Areas – despite Policy I4 seeking to promote exactly these qualities. I object that Guildford has not given biodiversity the full consideration legally required, in breach not only of these policies but their statutory duty under the NERC Act 2006.

- A46 and A47 both fall within the Green Belt, but their inclusion here is not justified. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF states ‘the essential characteristics of Green Belts are their openness and their permanence’ (NPPF). Past verdicts of planning inspectors have declared that Normandy/Flexford green fields (A46) contribute to the ‘openness’ of the Green Belt and a panoramic view of green fields to the Surrey Hills AONB.

Paragraph 4.3.1.2 of the Plan (under Policy P2) states that "only those villages whose open character makes an important contribution to the Green Belt should be included in the Green Belt". I contend that the land in both Policy A46 and A47 makes an unparalleled contribution to the Green Belt which stretches from Guildford in the east to Ash/Tongham in...
the west. If this area is inset and built upon in the manner proposed it will be the beginning of urban sprawl across this stretch of countryside which Green Belt policy was designed to prevent. The Government have indicated that Green Belt is supposed to be protected, but GBC are trying to justify development in this area when they themselves designated it as having a 'Red' status under their system for quantifying sensitivity (red being the most sensitive and least likely to be developed). GBC have totally ignored all policies on biodiversity when proposing to inset these areas.

New developments are supposed to maintain existing Green infrastructure and improve upon it; in order to secure sustainable development, there should be a net gain for biodiversity. It is impossible to agree that any Green infrastructure which would accompany this development could mitigate for the habitat loss and resultant decline of species.

According to the Council for Protection of Rural England (CPRE), 13% of the most important habitat areas identified in UK BAP occur in the Green Belt, and certain species such as the mistle thrush, song thrush and starling (known to use Site 46) are doing better in the Green Belt than in any other parts of England. Green Belt areas also show more positive trends of bird and butterfly species than in the urban fringes compared to them.

I object to the insetting of Normandy and Flexford (A46 and A47) from the Green Belt on the grounds that these areas contribute to the ‘openess of the Green Belt’

2.4.1 Impact on the wider environment of the Thames Basin Heaths Special Protection Area

I believe that the Plan is unsound in relation to Policy A46 as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact that this huge proposed development specifically will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The proposed development is considerably less than five kilometres away from the TBH SPA and not much beyond the 400m exclusion zone, occupying an area between under 1km, to just over 2km, from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. Furthermore, Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals (including dogs being exercised).

I therefore question whether enough - or indeed any - consideration been given to the potentially detrimental effect that the proposed strategic development between Normandy and Flexford will have on this internationally important site.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. Two hundred and sixty four dogs are likely to come with the proposed development, the current ratio of dogs per household being 24/100, so this could potentially attract between 26 and 132 extra dog-walkers a day.

To deter dog-walkers from visiting the TBH SPA, any Suitable Alternative Green Space (SANG) in the proposed development would have to be of exceptional quality, as the Nightingale Road and Dolley's Hill entrances to the TBH SPA are only either 5 minutes away by car, or 20 minutes on foot. Whatever the size, the SANG would be a very small area in which to exercise 264 dogs. A small number of irresponsible dog owners, who do not scoop the poop, will make such a small area unattractive for walk and play. This is already a problem on Normandy Common.

Another factor is that some areas where a SANG might be located are muddy in wet weather and throughout the winter, whereas many of the tracks on the TBH SPA are dry in wet weather, (including the winter). For those dissatisfied with the proposed SANG for whatever reason, or those wanting a longer walk, the natural alternative is the TBH SPA. If only 10%
of dog owners use the TBH SPA, there would be 26 extra dogs a day using the TBH SPA; if 50% do, it would be an extra 132 dogs a day.

I strongly believe, that given the proximity of the proposed development to two entrances to the TBH SPA it will be impossible to design a SANG that will deter many residents from using the TBH SPA to walk their dogs. This will have a very serious impact on the wildlife and overall environment (unique flora and fauna) of this internationally important area.

Natural England states: “Special Areas of Conservation (SACs) are European designated sites, they are afforded protection under the Conservation of Habitats and Species Regulations 2010. Generally speaking, when considering the impacts upon European sites, the Local Planning Authority, under the provisions of the Habitat Regulations, should have regard for any potential impacts that a plan or project may have”.

‘Natural England disagrees with the conclusions reached by the Habitat Regulation Assessment (HRA) and Sustainability Appraisal (SA) and advise that the plan is unsound on this basis’. Natural England states further: “We also have concerns that the Council does not appear to have adopted Government planning policy set out at paragraph 14 of the National Planning Policy Framework (NPPF) stating that local plans should meet objectively assessed development needs unless specific policies in the NPPF (such as protecting designated wildlife sites and landscapes) indicate development should be restricted.”

The Habitats Regulation Assessment document is incorrect. In Section 18 Policies 9, 10, and 13 are assessed but not the policies proposed in this version of The Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to A25, this would dramatically and detrimentally effect the village setting and be a foolish and irresponsible development adjacent to a motorway.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8079  Respondent: 15710433 / Simon Hester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to A35, development near our nation's royal NHS garden would ruin its setting in a site preserved for historic interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8076  Respondent: 15710433 / Simon Hester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the late inclusion of site A43

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8077  Respondent: 15710433 / Simon Hester  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17933</th>
<th>Respondent: 15710433 / Simon Hester</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am appalled by the suggestion of the North/South slip road on to A3 as will massively worsen the traffic situation in let us not forget a small rural village, especially as there is a far superior site at Potters Lane/ Ewebanks area away from the settled community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17932</th>
<th>Respondent: 15710433 / Simon Hester</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I overwhelmingly object to the removal of Guildfords greenbelt it makes the area special and desirable and helps to balance London's carbon emissions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4416</th>
<th>Respondent: 15710561 / Stephen Kirby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comments on the proposed submission local plan; stratagem and sites June 2016. I am a resident of West Horsley and have been for over 10 years. The reason I chose to live in the village was predominantly due to the peaceful, beautiful and unspoilt location. Whilst I am sympathetic to the reason for new housing I cannot understand why anyone would consider removing the green belt land to make way for such development. The areas proposed for development are home to a number of key indicator species of animals which determine the conditions of the local environment. One of these species is the Red kite. There are many other precious spices of bat and reptiles such as the adder which I have seen residing locally. Another privilege of living in the village. If the land use is change from green belt to allow the local council to sell the land for development, I fear greatly for the habitat destruction of the species mentioned, and these are just some examples. It seems so much effort has been put into making the environment habitable for these animals only to be lost for the short sighted gain of building homes. There are in my opinion many other brownfield sites that would benefit from this sort of development, but here is not one of those places.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4417</th>
<th>Respondent: 15710593 / Lilian Pan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I, Lilian Pan, of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] object to proposals for developments in the east and west Horsley area. The rich wildlife, natural, historic features of the area will be compromised. Due not only to the development work but unsustainable numbers of home / people due to populate an area with limited resources and amenities. The area is known to be a greenbelt area and we, the residents, proud of it.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17978</th>
<th>Respondent: 15711265 / Jonathan Dowling</th>
<th>Agent:</th>
</tr>
</thead>
</table>
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/4578  Respondent: 15711265 / Jonathan Dowling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
15. I object to the potential impact of para 4.4.23a on Burnt Common with its over allocation of industrial zoning is subterfuge for a waste management facility which is a dishonest and underhand approach to planning and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3020  Respondent: 15711265 / Jonathan Dowling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17985  Respondent: 15711297 / Jane Jervis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A25 – My Objections

1) Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for access from the development to the A247 with enormous traffic implications for the A247.

2) South bound off- and on- slip roads to service the development and replace the existing off-slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

3) A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

4) When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

   1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
   2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
   3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
   4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
   5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
   6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
   7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
   8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
   9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1931  Respondent: 15711393 / Kirk Georgiou  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy A43 – My Objections**

Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and theA247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I
object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policies ID1 & ID2 Infrastructure – My Objections

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits … “we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:
- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/585  Respondent: 15711393 / Kirk Georgiou  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The removal of green belt protection from the prison site meaning that it is likely to come forward for housing development. The nearest feasible access to the A3 is at the A247 junction.

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

The Plan fails to demonstrate that exceptional circumstances exist for each site that is to be taken from the green belt. The wording implies that it is legitimate to have a blanket change to green belt boundaries to facilitate development. That is not in accord with the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Non-plan Items – My Objections
Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Cumulative impact of changes – My Objections
Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please close Walnut Tree close road for the following reasons -

It has a long history of flooding, it floods completely at 3.08 metres, we watched the river level rise over 1 metre in an hour. If it flash floods faster as it did in 1968 there is no access for emergency services, cars will become submerged with the people in it. On 24th Dec 2013 it took over an hour to get gridlocked cars out of the road. Please review the photos attached and google Walnut Tree Close 1969 flood which has a view of GU1 4UI in the foreground (closest to the station).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Bedford Rd flooded Dec 2013.jpg (987 KB)  
- photo.JPG (755 KB)  
- Cinema flooded.jpg (829 KB)  
- Road flooded first around bridge.jpg (75 KB)  
- GU1 4UL flooded.jpg (617 KB)  
- Cinema & buildings flooded.jpg (898 KB)  
- Aquatico car park flooded.jpg (712 KB)  
- photo (2).JPG (919 KB)

Comment ID: pslp172/4515  
Respondent: 15714817 / Vicky Dowling  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below),
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4516  Respondent: 15714817 / Vicky Dowling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river
14. I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.
25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/4517  **Respondent:** 15714817 / Vicky Dowling  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2949</th>
<th>Respondent: 15714817 / Vicky Dowling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/573</th>
<th>Respondent: 15714817 / Vicky Dowling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/4459  **Respondent:** 15715969 / Michael Baxter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Thank you for your e-mail and I now return a copy of your plan having hatched in red those areas of the Estate which should be excluded from your assessment as public open space. I’m afraid the quality of the plan you send me is not that good so I have only been able to roughly identify the land that should be excluded. However as you will see it does cover a significant part of the Estate.

Having re-read again your criteria set out on page 41 of your assessment I believe I have correctly identified the land which does not fulfil the criteria as it is land that is not open for informal access either on a permissive or managed basis. Whilst there are some rights of way running through or adjacent to these areas of land they are no more open space than any other field within the locality. The areas I have identified are all run as areas of commercial woodland or commercial agricultural land.

I look forward to receiving your confirmation that these areas will be correctly identified and formally excluded from your assessment.

Please advise if we need to make a formal objection or whether this is sufficient for the purpose.

If you require me to identify the land more accurately then please send me a better quality plan.

I look forward to hearing from you.

1/2

I have been forwarded a copy of your Guildford Open Spaces, Sport & Recreation Assessment of June 2016 and am extremely surprised to see that without any form of consultation you have included large areas of the Albury Estate which are private and not open to the public as either accessible natural green space or park and recreation ground.

Significant parts of the Albury Estate are indeed open to the public but this does not extend to the following areas which are shown on the map for the Tillingbourne Ward contained in Appendix 2 of your assessment.
Some of the following areas may have public footpaths close by them, they are not publicly accessible spaces and should therefore be excluded:

- The Netherlands
- Chantry Wood
- The Boxes
- Tickners Copse
- The Warren
- Kiln Rough
- Far Plantation
- Mustard Copse
- Jugs Copse
- Broomfield & Blackheath Woods
- Silverwood
- Albury Park

On behalf of the Estate I wish to object in the strongest possible terms to their inclusion as they are private areas and I request that they are deleted from your plan.

I appreciate that it may be difficult for you to identify exactly which parts of the Estate are available to the public and which are private and if you care to send me a more detailed version of the plan contained in Appendix 2 I will happily draw the correct boundaries so that you can correct the plan.

I look forward to hearing from you with confirmation that the private areas of the Estate will be removed from your assessment forthwith.

2/2

<map attached>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [0045_0001.pdf](#) (418 KB)

---

**Comment ID:** PSLPP16/18302  **Respondent:** 15716833 / Charlie Bentham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/4474  Respondent: 15717121 / Mark Wyllie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] which borders the proposed path on its West side. I completely concur with Mr Jenkins view and would also add:

1. the proposed path will have a significant negative impact on the security and privacy of both [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. I have a young family and therefore object strongly to it
2. the proposed path will open up the southern boundary of our property (approximately 200m wide) which will also require new fencing and screening which will obviously increase the costs already mentioned by Mr Jenkins.

I am also happy to attend meetings to discuss this topic further.

[Mr Jenkins' Response attached]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: trevor.png (55 KB)
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are likely to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:
Loss of Green Belt, this is of particular concern as its will set a precedent which will have long term repercussions across the county.

I do not believe that the demand is actually there for the number of houses that have been proposed 693 almost double the previous stated figure of 322.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/18330  **Respondent:** 15717217 / Ian Ferguson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I note in the video the argument on the cost of affordable housing and the inability of staff to live close to their place of employment. I do not think this is a valid reason for building more houses. In my lifetime I have commuted to work and had to find affordable housing as close to my place of work as I could. In an ideal world we would all like to live a short distance from work but in reality this is not feasible or realistic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/18332  **Respondent:** 15717217 / Ian Ferguson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I have lived in Burpham for 24 years and seen the steady rise in new builds, with no consideration to the improvement of essential infrastructure. Given the proposed number of dwellings and the huge impact this would have on our roads, transport and the utilities especially Water this cannot continue, so why is there a lack of specific details of essential infrastructure especially as there is an acknowledged existing deficit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/18331</th>
<th>Respondent:</th>
<th>15717217 / Ian Ferguson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>We have seen a continued increase in the number of new builds in Burpham and this proposal of 2000 houses is far in excess of anything before and totally disproportionate to any other area in the borough.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/2091</th>
<th>Respondent:</th>
<th>15717217 / Ian Ferguson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I note that their appears to be a very limited consultation period why?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1607</th>
<th>Respondent:</th>
<th>15717217 / Ian Ferguson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>In View of flawed new evidence, Guildford’s proposal for more than 12426 homes (plus buffer of 1,155 homes) is excessive and will result in needless loss of green belt and green character, and increase congestion, that cannot be justified in our heavily constrained borough, Their is evidence Guildford’s population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1609  **Respondent:** 15717217 / Ian Ferguson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1608  **Respondent:** 15717217 / Ian Ferguson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/8169  **Respondent:** 15717473 / Mark Walles  **Agent:**

---
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8196  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so-called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces...
pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18427</th>
<th>Respondent: 15724353 / Arvnid Parmar</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18443</th>
<th>Respondent: 15724353 / Arvnid Parmar</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18445</th>
<th>Respondent: 15724353 / Arvnid Parmar</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the
south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18423  Respondent: 15724353 / Arvnid Parmar  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18425  Respondent: 15724353 / Arvnid Parmar  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18449  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18441  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18435  Respondent: 15724353 / Arvnid Parmar  Agent:
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18447  Respondent: 15724353 / Arvnid Parmar  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.
The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18429  Respondent: 15724353 / Arvnid Parmar  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18431  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18433  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18415  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.
To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/18411  **Respondent:** 15724353 / Arvind Parmar  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate
developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18413  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2102  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/2104  Respondent: 15724353 / Arvnid Parmar  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/2106  Respondent: 15724353 / Arvnid Parmar  Agent: 

I do not consider the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2108  Respondent: 15724353 / Arvnid Parmar  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4506  Respondent: 15724673 / Matthew Bell  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPA16/4505  Respondent: 15724673 / Matthew Bell  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8201  Respondent: 15724673 / Matthew Bell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18461  Respondent: 15724673 / Matthew Bell  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18469  Respondent: 15724673 / Matthew Bell  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18467  Respondent: 15724673 / Matthew Bell  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18458  Respondent: 15724673 / Matthew Bell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18471  Respondent: 15724673 / Matthew Bell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)</td>
</tr>
<tr>
<td>Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18464  Respondent: 15724673 / Matthew Bell  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to poor air quality concerns (Policy 13)</td>
</tr>
<tr>
<td>The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18454  Respondent: 15724673 / Matthew Bell  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)

There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPP16/18459  Respondent: 15724673 / Matthew Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to development in areas at risk of flooding (Policy P4)

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPP16/18453  Respondent: 15724673 / Matthew Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the local plan as the development proposed is not sustainable (Policy S1)

The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPP16/18460  Respondent: 15724673 / Matthew Bell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (Policy S2)

There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4504  Respondent: 15724769 / Joseph Neasmith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object to the Local Plan for East and West Horsley.

I believe that the Horsleys should remain as Green Belt. The exceptional circumstances required before taking this action have not been demonstrated.

There are no sound reasons for the boundaries of the settlement areas to be changed.

Infrastructure in Horsley is already overloaded. Local schools are full, drainage is inadequate, roads and car parks are overloaded.

Station Parade should not be designated as a District Centre. The nature facilities in the village centre have been misread.

I object to the development of over 2,000 houses at Ockham. This will have a huge and devastating impact on Horsley.
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4508</th>
<th>Respondent: 15724801 / Talei Fawcett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>I object to the proposed Infrastructure Schedule (Appendix C)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4507</th>
<th>Respondent: 15724801 / Talei Fawcett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>I object to the figure of 693 houses per annum in the borough being too high (Appendix D)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>GBC has not published any details as how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8204</th>
<th>Respondent: 15724801 / Talei Fawcett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

This is disastrous as the increased volume of traffic would impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Page 1642 of 2988
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the employment strategy and impact on Garlicks Arch (A43) (Policies E2 and E5)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

This will cause more congestion to the villages of Ripley, Send and Clandon, which have poor condition narrow roads and no footpaths, which are dangerous. More houses will increase this danger and unsustainable volumes of traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
<tr>
<td><strong>I object to the lack of proper infrastructure planning for sites (Policy I1)</strong></td>
</tr>
<tr>
<td>The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18475  Respondent: 15724801 / Talei Fawcett  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</strong></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
<tr>
<td><strong>I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)</strong></td>
</tr>
<tr>
<td>Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.</td>
</tr>
<tr>
<td>Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18472  Respondent: 15724801 / Talei Fawcett  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</strong></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
</tr>
</tbody>
</table>
I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18463</th>
<th>Respondent: 15724801 / Talei Fawcett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to not protecting the Green Belt (Policy P2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18466</th>
<th>Respondent: 15724801 / Talei Fawcett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPP16/18462</td>
<td>Respondent: 15724801 / Talei Fawcett</td>
<td>Agent:</td>
</tr>
<tr>
<td>---------------------------</td>
<td>----------------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the local plan as the development proposed is not sustainable (Policy S1)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The volume of proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18468</th>
<th>Respondent: 15724801 / Talei Fawcett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the Borough Wide Strategy (Policy S2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is too much development in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between M25 and Burpham, which will merge all the villages and their identities. This is unfair and unreasonable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4509</th>
<th>Respondent: 15724865 / Edward Craft</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I write as a resident of West Horsley in response to your draft Local Plan. I draw attention to my two previous detailed letters of 17 September 2014 and 28 November 2013 in relation to your previous form of draft Local Plan and the Strategy and Sites document respectively. Much of the comments in those letters do not seem to have been specifically considered in this latest Local Plan. As a general comment, I believe that you have demonstrated both irresponsibility with public funds and poor custodianship by not specifically addressing the points previously raised.

In the continued period of austerity I think that you have unnecessarily wasted significant sums of residents’ money in the manner in which you have pursued the local plan process, more focussed on razzmatazz surrounding it and self-promotion rather than seriously, substantively and constructively engaging with residents and precipitating a point of consensus. I have been particularly disappointed in GBC’s conduct in relation to these proposals given the massive mismanagement that was demonstrated in 2013-214. Lessons do not seem to have been learned.

As an initial comment, I believe that you have wasted a great deal of public funds and energies of residents in this process. You could have considered matters better and allowed for a more focussed, constructive debate that the one you have precipitated.

My principal comment is to object to the proposal for villages being removed from the Green Belt. I do not believe that there is sufficient reason for this and, furthermore, to do so would be unlawful and ultra vires because exceptional circumstances for blanket removal has not been, and cannot be demonstrated. Development in the Green Belt can only be justified when other options have been exhausted: this is demonstrably not the case.

GBC should be working to improve the area and the efficiency of Guildford as a major town, increasing population density within the central urban area in a sustainable manner and thereby reducing private traffic movement.

Development on the Green Belt can only be justified in narrow circumstances. It is accepted that specific fields might be appropriate for release from the Green Belt where specific exceptional circumstances exist, such as where the provision of essential community infrastructure (such as schooling and healthcare facilities) is required, but this is an exception to the general rule. The blanket removal of villages from the Green Belt (as is proposed) is both lazy and irresponsible and will do little to actually support the need for sustainable growth in the area.

Development should be focused on Guildford Town Centre

Guildford is Surrey’s country town and is a leading town centre in Southern England, boasting a major university, many corporate head offices and thriving community assets, such as the Cathedral community. Accordingly, Guildford should be the focus of development within the borough, whether that be commercial or residential. For thousands of years it has been clear that conurbations are the most efficient and effective manner in which to manage human populations and, accordingly, if there is to be population growth in the proportions projected by GBC, our largest town centre is the most appropriate place for this.

Regardless of the other overriding reasons to object to development across the Green Belt, there has been a lack of consideration for social infrastructure and transport connections. These will be best delivered in Guildford town centre, with improved connections to Guildford from the villages. East and West Horsley’s local facilities (including local shops, parking, schools, medical services and transport infrastructure) are inadequate to cope with the numbers you contemplate for increase in population. Development in East and West Horsley would lead to a great increase in car use, which is contrary to sustainable transport policies. The roads of East and West Horsley are of poor quality, are narrow and cannot sustain further traffic. The Station parade area of East Horsley is regularly overcrowded and the changes of the area were demonstrated by the awful accident at the Station Approach/Kingston Avenue junction during afternoon peak hours. Train services from Guildford are, and will always be, much better than from Horsley.

No exceptional circumstances which justify development of the Green Belt

GBC has, to date, failed to make any case that exceptional circumstances exist to justify any attack on the sanctity of the boundary of the Green Belt as it currently stands. Indeed, GBC seems to be adopting a position which is contrary to central government policy. To do so will lead to any decision being changed as ultra vires, thereby exposing GBS (and, effectively, its rate payers) to the unnecessary cost of judicial review.
Those who have made a conscious decision to live in a village within the metropolitan Green Belt appreciate the constraints (and responsibilities) that places on them, restricting what they can do with their land.

In the Winter 2013 copy of About Guildford GBC stated the importance of maintaining a continued sense of community and to recognise the distinct character of each of the villages within the borough. The status of much of the borough as metropolitan Green Belt land is fundamental to this, protecting the area from the encroachment of London from the north east and from Guildford itself as well. Accordingly, the process for the development of the local plan must be delivered with the protection of community and the environment at the forefront. There is insufficient and inadequate evidence that this has been done. No sufficient consideration has been given to the legacy we would create for our children if GBC’s wide-scale development assault on the Green Belt is allowed to proceed.

Accordingly, I strongly advocate for East and West Horsley (and the other villages within the borough) to remain within the Green Belt and should not be removed from it. However, if there is a powerful case for the re-zoning of a particular field or fields for reasons which satisfy the high threshold set, that could be supported on a case-by-case basis. GBC is yet to do this on a case-by-case basis but, if any when it does I would be happy to lend my support. Given the current political trend for referenda rather than elected politicians demonstrating leadership, perhaps the solution is to hold a multiple choice local referendum with a series of questions.

The provision of vital community infrastructure is a powerful example of where the sacrifice of a small piece of Green Belt land might become appropriate, provided that there is no other viable alternative. Similarly, such a sacrifice should not be used as the thin end of any wedge to then open the door from property speculation for commercial purposes.

Loss of Green Belt Land is Irreversible

As you will have remembered from my previous letters, to change the planning status of the Green Belt land around the metropolis and around Guildford would sent a clear (and negative) message that the rural nature of our precious and beautiful county is not something for which we are simply custodians and which therefore requires protection. A continued development linking London to Guildford along the axis of the A3 would be unacceptable and is contrary to the objective of Green Belt designation.

The Green Belt land in the east of the borough protects our most precious natural asset, the North Downs and Surrey Hills, in their true, undeveloped, context. We should be justly proud of being the most wooded county in England (much of it ancient) and do everything to ensure that this precious heritage is passed down to future generations.

We have much to thank former generation for in the protection of our county's countryside in a manner which has delivered a vibrant local economy, whilst protecting our heritage. Today, it is the responsibility of the current councillors and officers of GBC and its residents to ensure that the work of past generations is not for naught and that the special characteristics of our borough are maintained.

If the Green Belt status of vast swaths of the borough were removed, there is a genuine risk that it only the SSSI/AONB areas would be appropriately and sufficiently protected from development for the benefit of biodiversity and for our children and successive generations.

It should be remembered that that Green Belt status assists GBC in its stewardship of the borough so as to protect the precious nature of the area, whilst also permitting sustainable, proportionate and sympathetic development. Green Belt status clearly identifies areas which are “off limits” for most development. By proposing to move the boundaries of the Green Belt you will make your own role harder than it needs to be.

Loss of undeveloped land within the current Green Belt is irreversible and it is our collective social responsibility, and your legal responsibility as public steward, to ensure that this does not happen.

Planning Policy Guidelines in relation to the Green Belt

I would like to bring GBC’s attention to page 19 of the DCLG National Planning Policy Framework (March 2012) (the "NPPF"). In the NPPF DCLG sets out five purposes served by the Green Belt. These are listed below:
# Purpose Achieved by the current GBC Green Belt?

<table>
<thead>
<tr>
<th>#</th>
<th>Purpose</th>
<th>Achieved by the current GBC Green Belt?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>check the unrestricted sprawl of large built-up areas</td>
<td>Y</td>
</tr>
<tr>
<td>2.</td>
<td>prevent neighbouring towns merging into one another</td>
<td>Y (towns and villages)</td>
</tr>
<tr>
<td>3.</td>
<td>assist in safeguarding the countryside from encroachment</td>
<td>Y</td>
</tr>
<tr>
<td>4.</td>
<td>preserve the setting and special character of historic towns</td>
<td>Y (towns and villages)</td>
</tr>
<tr>
<td>5.</td>
<td>assist in urban regeneration, by encouraging the recycling of derelict and other urban land</td>
<td>Y</td>
</tr>
</tbody>
</table>

In applying the NPPF to the borough GBC should only consider changes to Green Belt status once other non-Green Belt areas have been effectively developed and once a continuing unsatisfied demand is demonstrated. At present, this is not the case and GBC is encouraged to assess each borough candidate site within the current metropolitan Green Belt against the above criteria. GBC should therefore make no mention of any piece of land within the current boundaries of the Green Belt within its Local Plan unless and until it has failed to adequately meet housing and other land use need from other sites: this is not yet the case.

GBC should use the full array of powers available to it (including powers of compulsory purchase) to ensure that brownfield and other non-Green Belt sites are appropriately developed before any assault is made on Green Belt status. Any assault on the Green Belt may only be considered appropriate once all sites have been fully developed and a continuing unsatisfied demand demonstrated.

In November 2013, the then leader of GBC said that GBC “will not be building on the Green Belt until we have exhausted all usable brownfield sites first”. Such a statement was very encouraging, but now GBC need to be kept honest to stick to this promise, commitment and aspiration. Such a responsible approach is not reflected into the draft Local Plan which seeks to remove villages from the Green Belt from a sense of apparent laziness before developing the brown field options.

It is recognised that appropriate, proportionate, sympathetic and sustainable development is desirable and necessary. In that regard, the NPPF states that the construction of new buildings within the Green Belt should be regarded as inappropriate, subject to certain exceptions.

The most relevant exceptions in relation to the future planning policy relevant to East and West Horsley (emphasis added) are limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan and the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt.

The Local Plan proposals for East and West Horsley go far beyond these limited exceptions (both in nature and extent) and would have a significantly detrimental (and irreversible) impact on the natural characteristics of the area, as well as being unsustainable with regard to the existing local infrastructure. The existing local infrastructure struggles to bear existing demands, in particular board traffic levels of quiet rural roads, village parking and school access.
In the aftermath of the successful High Court challenge to the Solihull Local Plan the Secretary of State for Communities and Local Government has made it clear that there is a two-fold test for any intended development on Green Belt land:

1. Firstly, whether land should be taken out of the Green Belt at all; and
2. Secondly a hurdle as to what should be put on the land which hitherto benefitted from Green Belt categorisation.

There is a high threshold to pass for each. GBC has not demonstrated this in respect of the Green Belt land within the borough. I am keen to ensure that GBC does not waste further monies in pursuing Local Plan proposals which will be struck down through a judicial review or face any other legal challenge. Accordingly, I urgently call upon GBC to produce more reasonable, reasoned and acceptable proposals which are consistent with the NPPF and the legal regime.

**Improved safety for pedestrians and cyclists needed**

Improved road safety to ameliorate the village environment for cyclists and pedestrians is vital. GBC should work with the highways authority and enforcement agencies to apply a zero tolerance attitude towards antisocial, dangerous and aggressive motorists. Safety for sustainable travel in villages attracts insufficient attention in your Local Plan.

Generally, much more work needs to be done by GBC (in conjunction with Surrey County Council as the highways authority and the Parish Councils) to slow motor vehicles and to protect pedestrians and cyclists in East and West Horsley. The potential proposals in relation to East and West Horsley and Ockham give insufficient consideration to the infrastructure and the inability of the current road network to satisfactorily service the increased demand that would be placed upon it by potential development.

It is also important for GBC to ensure that footpaths and cycle paths remain accessible, are not overgrown and left with plant detritus and the metal surfaces remain of appropriate quality. Once this is done, better lighting for pedestrians and cyclists should also be considered.

The roads in the villages are inappropriate for existing traffic using them and something must be done to ensure that they are no longer used as a cut through by commercial vehicles seeking to avoid the major trunk road network: this needs to be carefully considered as part of the local plan adoption process.

**Lack of proportionality in development in the area and lack of sustainability**

GBC’s proposals for development in East Horsley and West Horsley are disproportionate to the area. Development should be focussed on Guildford Town Centre and increasing density in urban zones rather than increasing the size of sensitive villages which would:

- lead to a disproportionate impact in comparison with other parts of the borough better placed to deal with large population increases (in particular, Guildford Town Centre);
- cause irreversible harm to the Green Belt and the Surrey Hills AONB;
- place unmanageable pressure on local infrastructure (in particular, the local shops in East Horsley, Horsley Station, the Raleigh School, the Medical Centre and local roads);
- cause irreversible harm to the Green Belt; and
- not be sustainable.

Sustainability goes far beyond deploying low-carbon construction techniques.

Some limited development at Ockham Airfield might become appropriate if it met sustainability needs, focussed only on brownfield land and was accessible only from the A3, so as to not harm the villages. However, to deliver such a plan, it would be necessary to also address traffic congestion issues with Highways England on the A3 and the M25.

**Conclusion**

Once development takes place on land, the change to the nature of an area is irreversible. Many appropriate non-Green Belt sites available within the borough which may be available for development and a number of these candidate sites are in public ownership: in order to comply with the NPPF and to ensure that GBC is able to optimise its cash position other
candidate sites (particularly those within GBC or other public sector ownership) should be fully developed before any review of the Green Belt is undertaken.

Whilst it is appreciated that the EU referendum exit decision has been thrust upon the people of Guildford against our will, it is clear that central government policy will be moving against population increase through immigration. Accordingly, GBC needs to re-run your household growth modelling to reflect this new paradigm once central government policy is clarified.

GBC is presented with an opportunity to be innovative in its planning policy, whilst protecting the heritage and value of its precious landscapes. For example, GBC should carefully evaluate the use of high-density development around Guildford station with new communities built above commercial units at ground level (a very attractive prospect for commuters). GBC has, as yet, failed to demonstrate innovative thinking. I implore you to now assume the role of a responsible steward and to develop proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 12006901_1_13384 (1).docx (41 KB)

Comment ID: PSLPS16/8209  Respondent: 15724961 / M.R McPherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution
- treasure with pride the natural beauty of the Hog's Back

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8211  Respondent: 15725025 / M Morris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council's draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge - a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8216  Respondent: 15725185 / Jackie McKenna  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously—air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency. I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18496</th>
<th>Respondent: 15725185 / Jackie McKenna</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18497</th>
<th>Respondent: 15725185 / Jackie McKenna</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4516</th>
<th>Respondent: 15725409 / Nicholas Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4517</th>
<th>Respondent: 15725409 / Nicholas Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8226</th>
<th>Respondent: 15725409 / Nicholas Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8227</th>
<th>Respondent: 15725409 / Nicholas Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8228</th>
<th>Respondent: 15725409 / Nicholas Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18510</th>
<th>Respondent: 15725409 / Nicholas Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18507  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18508  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18509  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18517  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18515  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18516  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18511  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/18512  **Respondent:** 15725409 / Nicholas Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.
Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18513  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18514  Respondent: 15725409 / Nicholas Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18505</th>
<th>Respondent: 15725409 / Nicholas Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18506</th>
<th>Respondent: 15725409 / Nicholas Ward</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/18504  **Respondent:** 15725409 / Nicholas Ward  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Proposed Submission Local Plan: strategy and sites 2016 – Representation on behalf of Sir Rocco Forte and Lady Alicia Forte owners of the Ryde Farm Estate.

I refer to previous submissions made in respect of the emerging Local Plan including our letters of 22nd September 2014 and 8th September 2015. It is with considerable disappointment that our client finds that the proposed Submission Plan has excluded the site at Ripley Lane, West Horsley (previously known as Land to the west of West Horsley (south) – Policy Reference 73) from its proposed allocations.

This objection to the Plan is based upon our view that the Green Belt assessment for this site is flawed and that this the Plan has not correctly considered all of the reasonable alternatives at West Horsley. We are of the view that the Council has misdirected itself in that respect when concluding that the site should be removed from the proposed allocations.

When the revised Plan was presented to the Council on 13th April 2016, the officers provided a briefing note which summarised how the Plan has changed. It stated:

“This note seeks to focus on the changes made to the draft Local Plan and the reasoning behind those changes. Much of the evidence base has been updated and, together with the representations received as part of the formal consultation process, has been instrumental in informing changes to the plan. The use of the spatial hierarchy to accommodate sustainable development remains fundamentally unchanged. However, the use of the Sustainability Appraisal and the Green Belt sensitivity assessment have resulted in significant changes to the plans site allocations. The site allocations are concentrated on larger sites and a number of allocations on Green Belt sites of high sensitivity have been removed from the plan.”

The briefing note also states:

“A number of sites have been removed around Send and a site adjacent to West Horsley.”

It is not clear if this refers to the Ripley Lane site, but it is reasonable to assume so.

However, we consider that the Ripley Lane site was assessed incorrectly and that the result was an incorrect scoring of the site against Green Belt objectives to its disadvantage as against other sites within the West Horsley area and beyond.

The site does not threaten unrestricted sprawl as it is contained with the perceived settlement boundary as defined by the Council.
The site clearly has no function in contributing to the merger of settlements. Parcel D6 of the Green Belt Sensitivity Analysis was clearly intended to identify the open greenbelt space between the West and East Horsleys, but the Ripley Lane site is on the western side of West Horsley. The conclusion that the site would cause a merger between settlements is clearly wrong.

The assessment that parcel D6 assists in safeguarding the setting of the East and West Horsley Conservation Areas is a misinterpretation of the national guidance. The proper consideration is the “setting and special character of historic towns”, not individual Conservation Areas. Conservation Areas provide a protection regardless of whether they are in a Green Belt or not. Even if this were not the case, the Ripley Lane site is not adjacent to any Conservation Area and the degree of intervisibility between the site and the West Horsley Conservation Area (the nearest) is severely restricted due to the vegetation around Pincott Farm.

We have also identified further flaws in respect to the scoring of other sites in the West Horsley area which has prejudiced our client’s site.

We would therefore request that the Council corrects the serious flaws in the assessment of our client’s site and re-instates the allocation status previously offered in earlier versions of the Local Plan prior to Submission of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1218  Respondent: 15728289 / Sir Rocco & Lady Alicia Forte  Agent: D2 Planning Limited (Des Dunlop)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H7 – Affordable Housing

We have no objection to the principle of this policy which seeks to provide affordable housing either on site or as payment in lieu offsite. However the provision of affordable housing is subject to viability considerations and such issues are silent within this policy. The reference to viability assessments should and must be included within this policy.

Recommendation

Amend the policy to include reference to viability assessments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1219  Respondent: 15728289 / Sir Rocco & Lady Alicia Forte  Agent: D2 Planning Limited (Des Dunlop)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the Council’s approach in principle to the most suitable strategy to accommodate future housing development. As part of that strategy land currently within the Green Belt has been assessed as to whether it represents the most suitable option for future development in accordance with national guidance.

The objectors own some 9.8 hectares of land at Ripley Lane, West Horsley (plan attached). This site lies within the Green Belt but has been previously assessed within the Council’s Green Belt Study as providing: - “opportunities to accommodate appropriate development without compromising the purposes of the Green Belt.”

The site was identified particularly as it was: - “generally contained by local undulations, hedgerows and railway infrastructure”

Accordingly, the site was allocated for residential development under Policy 73 of the draft Local Plan. However, the allocation was subsequently deleted in subsequent versions of the Local Plan. It is unclear why the draft allocation was deleted particularly when the site was assessed as being suitable for release and allocation.

Sensitivity Analysis of Sites in the Green Belt

The original Guildford Borough Green Belt and Countryside Study was produced in 2013 but during the subsequent period was amended several times. The resulting ‘suite’ of documents is therefore an amalgamation of different approaches to the topic.

The core of the methodology is the four states of analyses that result in a conclusion about specific sites within the Green Belt as to their appropriateness for development. Stage 1 identifies the land parcels that are the basis of the analyses, Stage 2 assesses the degree to which each parcel contributes to the mandatory purposes of the Green Belt, Stage 3 assesses the sustainability credentials of the land parcels and Stage 4 assesses their environmental capacity. Firstly, it is important to note that the ‘parcels’ are not necessarily ‘proposed sites for allocation’. So for example, four of the West Horsley proposed allocations falls within one parcel, whilst Ripley Lane alone falls within a difference parcel.

The Stage 1 analysis parcelled up the West Horsley area as shown in the following extract from the associated map.

The parcels are not arbitrarily drawn and use existing landscape features to define their boundaries. However, notwithstanding this, some ‘rules’ have been applied: -

“The criteria for establishing the land parcels included the following parameters:
- Land parcels should follow identifiable landscape features
- Land parcels should not cross motorways, A roads or railway infrastructure
- Land parcels should only cross railway lines and rivers at bridges
- Land parcels should not cross zone boundaries”

These ‘rules’ are a subjective assessment of where a boundary should lie. The red lines shown on the plans define the parcel boundaries. The Ripley Lane site lies within the defined parcel D6 but having examined this against the ‘rules’ used the Ripley Lane site could just as easily have fallen within parcels D5 (using the edge of settlement hedgerow boundary rather than Ripley Lane tree/hedgerow feature) or C13 (using the ability of parcels to cross a railway line at a bridge).

The importance of defining a parcel boundary is revealed when one examines the Stage 2 analysis. This looks to each parcel to decide whether it fulfils one or more of the relevant purposes of the Green Belt. These purposes are defined in national guidance as: -

1. To check unrestricted sprawl of large built-up areas
2. To prevent neighbouring towns from merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns”

Each site is then scored 0 to 4 where 0 is where the parcel doesn’t fulfil that purpose and 1 is where it does. Therefore any one site could have a score of 0, 1, 2, 3, or 4. The stated methodology is that sites which score 3 or 4 means that the parcel should remain in the Green Belt. So, in the case of parcel C13 where the four other West Horsley sites are located, this is scored 2. To obtain this score the conclusion reached by the study is that it checks the northward sprawl of West Horsley (score 1), it assists in safeguarding the countryside from sprawl (score 1), it does not help to prevent neighbouring settlements from merging (score 0) and is not need to preserve the setting of a historic town (score 0). Hence why these four sites remain under consideration at this stage.

However, in the case of parcel D6, where the Ripley Lane site is located, all four of these purposes are scored 1, to a total of 4. Hence this is why the site is deemed to be in a sensitive Green Belt location and is so unsuitable for development. This is essentially different to the previous analysis that concluded that the site could be removed from the Green Belt.

In our opinion these analyses are flawed. In respect of the Ripley Lane site, it could only be considered a site that threatens unrestricted sprawl if there were no clear physical boundaries to such a spread. The site is bounded by the railway line on one side (already accepted in the methodology as a substantial boundary) and by residential development on two sides. The fourth side is bounded by a substantial semi woodland/hedgerow boundary and by Ripley Lane itself. At the very least the score of 1 is debatable.

The site clearly has no function in contributing to the merger of settlements. Parcel D6 was clearly intended to identify the open greenbelt space between the West and East Horsley, but the Ripley Lane site is on the western side of West Horsley. The conclusion about it causing a merger between settlements is clearly wrong and should not have been included as scoring 1 as happened to the rest of the parcel.

The assessment parcel D6 and thus Ripley Lane is correctly assessed as a site which assists in safeguarding the countryside from encroachment and so is properly scored as 1.

The assessment that parcel D6 assists in safeguarding the setting of the East and West Horsley Conservation Areas is a misinterpretation of the national guidance. The proper consideration is the ‘setting and special character of historic towns’, not individual Conservation Areas (the nearest) is severely restricted due to the vegetation around Pincott Farm. The conclusion that it preserves the setting of a historic town, even of a Conservation Area is totally unpersuasive and this assessment can be argued to score 0.

In addition, the scoring of parcel C13 looks odd in context. It scored an overall 2 but it is unclear why two of the sites (Site Ref A39 and A41) do not have a similar role to play in avoiding neighbouring sites from merging to that land which is within parcel D6 to the south beyond the railway line. Therefore why these two sites don’t score 3 instead of 2 and so taking them outside the area to be considered for development. It is another example of how the assessment parcels do not take account of the Green Belt sensitivity differences between parts of the parcel.

In conclusion, of the sites proposed for allocation at West Horsley in earlier drafts of the Plan, Ripley Lane had been excluded from the new draft Plan on the ground of a flawed Green Belt analysis.

**Assessing the Settlement Boundary for ‘Inset Village’ Status**

Volume IV of the Green Belt study deals with the methodology used in defining the ‘inset village’ status for the purpose of excluding West Horsley from the Green Belt. It is essentially about defining an appropriate settlement boundary.

The assessment is a staged process; first identifying the type of development that exists and then the extent of the village as perceived to be apparent in the Green Belt. Given the topography and close proximity of the Ripley Lane site to the village, it is not surprising that the site lies within the village envelope identified on the assessment plan.

The assessment then identifies strong linear features such as roads and hedgerows and it is here that the subjective assessment notes the strength of the Ripley Lane feature and that of the fence line behind the properties along Silkworm lane. This formed the basis of the line drawn around West Horsley which excluded the Ripley Lane site. We are firmly of the view that this assessment is flawed for it failed to take account of the strong semi-woodland and hedgerow along the
edge of the site at Ripley Lane which could be reasonably considered as a stronger feature than that chosen, lying behind the properties at Silkwork Lane. It is interesting to note that only a fence boundary defines the land owned by John Clark which is therefore contained within the village boundary for inset purposes thus releasing that land from the Green Belt designation.

The Sustainability ‘Credentials’ of Sites

It is unusual for a Green Belt Study to stray into the role of undertaking sustainability analyses of specific proposed sites, but this is contained within Volume III of the suite of documents and is part of the methodology used. The title of the document identifies the method used ‘Sustainability Walking distance Plans for Land Surrounding the Villages’. The study identifies the services available locally (rail stations, shops, schools, healthcare, SANGs, amenity spaces, community hall) and then works out how far it is to walk to them.

What this analysis concludes is that of the sites proposed within West Horsley, Ripley Lane does perform poorly in relation to others proposed for allocation. However, this is unsurprising given the criteria used and the obvious fact that is it East Horsley that contains the great majority of the services available in the area.

However, whilst the analysis is a complex methodology and comprehensively applied, the analysis is spread over several documents and it is not obvious what influence it had in the decision to remove Ripley Lane from consideration as an allocation. Neither is it clear from what has been published why ‘walking distances’ was the only sustainability criteria used. A Sustainability Analysis of Sites, as set out in the Council’s Sustainability Report of the Plan, is more comprehensive in its range of topics used and we would expect this document to form the basis of the criteria to be used on specific sites and that it would be more than one criteria.

The Ripley Lane site has been treated unfairly in the emerging Local Plan and that it should be reinstated as an allocation.

Recommendation

Delete the Ripley Lane site from the Green Belt and allocate for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1217  Respondent: 15728289 / Sir Rocco & Lady Alicia Forte  Agent: D2 Planning Limited (Des Dunlop)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections have been previously lodged to this policy on the basis that the Local Plan is not meeting its objectively assessed housing need in the period up to 2034.

The NPPG states that the primary objective of identifying housing need is to:

- “identify the future quantity of housing needed, including a breakdown by type, tenure and size;
• identify the future quantity of land or floorspace required for economic development uses including both the quantitative and qualitative needs for new development; and
• provide a breakdown of that analysis in terms of quality and location, and to provide an indication of gaps in current land supply."

The NPPG goes on to state that:

“The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within the development plans.”

The objector has serious concerns over the Planning Authority’s concept of the requirements of the paragraph 47 of the NPPF and the NPPG. There are three significant recent changes to the legal context concerning the meeting of objectively assessed housing need. These are as follows:

i. Hunston Properties Limited (1) Secretary of State for Communities & Local Government and (2) St Albans City & District Council [2013] EWCH 2678 (admin);

ii. Gallagher Homes Limited (2) Lioncourt Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1783 (admin); and


Paragraph 47 of the NPPF states that:

“...local planning authorities should... use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework.”

The Hunston judgement found that in paragraph 26 the qualification contained in the last clause of paragraph 47 quoted is not qualifying housing needs. It is qualifying the extent to which the Local Plan should go to meet the need. To meet assessment objectively arrived at is not affected in advance of the production of the Local Plan which will then set the requirement figure. Colloquially, the ‘objectively assessed need’ is a ‘policy off’ figure where the Local Plan strategic housing requirement is a ‘policy on’ figure that qualifies the full objectively assessed need by reference to the policies of the NPPF. In South Northamptonshire v Secretary of State for CLG and Barwood Homes Limited [2014] EWHC 570. Ouseley J confirmed, in paragraph 32, that:

“... until the full, objectively assessed needs are qualified by the policies of an up to date Local Plan, they are the needs which go into the balance against any NPPF policies. It is at this stage that constraints or otherwise may apply. It may be problematic in its application, but that is how paragraph 47 works.”

In the Gallagher judgement, at paragraph 31, Hickinbottom J differentiates NPPF guidance on meeting housing need from that previously the case within PPS3 where he states that:

“Thus, paragraph 47 makes full objectively assessed housing needs, not just a material consideration, but a consideration of particular standing.”

In paragraph 53 of the judgement, the approach of the NPPF is stated as:-
Paragraph 88 of the judgement confirms that: -

“... where there is no Local Plan, then the housing requirement for a local authority for the purposes of paragraph 47 is the full, objectively assessed need.” Confirming Ouseley J above, paragraph 94 states that the balancing exercise required by paragraph 47 cannot be performed without being informed by the actual full housing need. Paragraph 98 highlights the new NPPF world with its greater policy emphasis on housing provision and paragraph 100 refers to the need for the objectively assessed housing need to be ‘a driver’ of the housing requirement target as opposed to, it was conclude, it being a back seat driver in the case in question.

The Local Plan makes provision for some 12,426 new dwellings in the period 2015-2034. This equates to some 654 dwellings per annum. We do not believe that this represents the Full Objectively Assessed Need for Guildford Borough and that it should be significantly increased. The Strategic housing Market Assessment dated September 2015 concluded that the overall housing need in Guildford was 693 dwellings per annum. This resulted in a total housing provision of some 13,167 dwellings in the period up to 2034. The Addendum update recalculated the housing provision and concluded that a lower figure of 12,476 dwellings, a reduction of some 691 dwellings overall was appropriate. However, the Addendum concludes that: -

- Housing need to support forecasted jobs growth 555-584 dwellings per annum
- Affordable Housing Need 517 dpa
- Student Need 73 dpa
- C2 Use 73 dpa

We believe that if affordability issues are to be properly addressed in Guildford that the overall housing provision should and must be increased. On that basis we believe that a housing provision of some 700 dpa is a more appropriate figure if housing needs are to be met in full. This figure should be expressed as a minimum.

**Recommendation**

That the proposed housing provision be expressed as a minimum and that the Local Plan should plan for additional housing of at least 700 dpa or 13,300 dwellings in the period 2015-2034.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Site Allocation A28: Land to the East of White Lane, Ash

Our Client support the allocation of Site A28 for approximately 62 new homes.

The site would, however, be more appropriately described as Land East of White Lane, Ash. This would reflect the Proposals Map designation which shows the site within the defined Ash Urban Area.

The site currently included within the Site Allocation extends to 1.9 Hectares and is currently open pasture land. To the north of the site is the route of a former (now dismantled) railway line. The site has access from White Lane. The site area should be increased to include additional land to the south (2.48 hectares) which will largely form a landscape buffer but which may be required in part on the road frontage to facilitate access and visibility.

The summary table at Page 24 lists the 62 unit capacity as a ‘Total number of Homes- Approx’, however, this should not be imposed as a limit on site capacity.

Our Client agrees with the Council that the site may be suitable for residential use, however, also highlights that the site could be suitable for a C2 care village or other specialist retirement housing use.

SUPPORT ALLOCATION

Our Client supports the inclusion of land to the east of White Lane, Ash Green (Site A28) The Client, however, recommends that:

• The site description is amended to Land to the East of White Lane, Ash to reflect the inclusion of the site in the amended Ash Urban area;
• The identified site area is enlarged to include the additional land to the
• The Site Allocation recognises the potential for use as a C2 care village or other C2 accommodation for older people or other specialist retirement

James Brown ShrimplinBrown Ltd 15th July 2016

JOB REF: 16118


What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1: MAKING BETTER PLACES

The broad principles of this policy are supported, however, our Client has some concerns regarding the implications of practically applying some of the potentially ambiguous objectives and how the council may seek to apply these general principles in future detailed development control policies.

Our Client support the objective to deliver high quality design and the enhancement of the environment on all new developments. There are, however, a number of aspects of the more prescriptive policy text that should be clarified/adapted as follows:

The threshold of 25 dwellings or more is too low and does not reflect a scale of development which may in all instances:

- Deliver a mix of uses; and
- Provide play, recreation and other public spaces for the local

These objectives should be focused on larger scale residential development, particularly in the context of some of the significant sites proposed as part of the Council’s housing supply. A more realistic approach would be to set a threshold of 100 units where these objectives ‘must’ be provided and provide encouragement for these objectives on smaller sites.

With regard to the provision of play and recreation space and the tangible changes that can realistically be made in terms of prioritising non-car travel in new village sites of less than 100 units will be limited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1: MAKING BETTER PLACES

The broad principles of this policy are supported, however, our Client has some concerns regarding the implications of practically applying some of the potentially ambiguous objectives and how the council may seek to apply these general principles in future detailed development control policies.

Our Client support the objective to deliver high quality design and the enhancement of the environment on all new developments. There are, however, a number of aspects of the more prescriptive policy text that should be clarified/adapted as follows:

The threshold of 25 dwellings or more is too low and does not reflect a scale of development which may in all instances:

- Deliver a mix of uses; and
- Provide play, recreation and other public spaces for the local

These objectives should be focused on larger scale residential development, particularly in the context of some of the significant sites proposed as part of the Council’s housing supply. A more realistic approach would be to set a threshold of 100 units where these objectives ‘must’ be provided and provide encouragement for these objectives on smaller sites.

With regard to the provision of play and recreation space and the tangible changes that can realistically be made in terms of prioritising non-car travel in new village sites of less than 100 units will be limited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18714  Respondent: 15733665 / Vortal Properties Ltd  Agent: Shrimplin Brown (James Brown)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D2 SUSTAINABLE DESIGN, CONSTRUCTION AND ENERGY

It is important that new development achieves a good level of design that respects existing character, however, the Council have a balancing exercise to ensure that they make the maximum productive use of identified sites in order to ensure that the most important ‘natural, built and heritage environments are protected.’ Including making maximum use of sustainably located sites within and adjoining existing settlements.

The Council must also be careful to ensure that unrealistic design standards or the constraints of historic character do not undermine the delivery of new growth.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18715</th>
<th>Respondent: 15733665 / Vortal Properties Ltd</th>
<th>Agent: Shrimplin Brown (James Brown)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

POLICY D4: DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES

Our Client is supportive of the proposed changes to the Urban Area and Settlement boundary shown around Ash; specifically the inclusion of Site A28. However, whilst the overall objectives of the policy guidance set out at Policy D4 are acknowledged and broadly supported by Our Client it is considered that the tone of the policy could serve to curtail rather than encourage the development of the specific site allocations identified in the Plan. Paragraph 4.5.46 suggests that the policy is targeted to windfall opportunities, however, the wording could still be applied to ‘all new development’ including site allocations. Our Client contend that this would undermine the delivery of Site Allocations and impact on the delivery of the Council’s housing target.

The expansion and development of edge of settlement sites will necessitate some changes in scale, massing and height. It will also be necessary to build at increased densities in order to ensure the most effective use of land. Whilst it will be important to ensure that new development successfully integrates within areas and does not impact on the amenities of neighbours the Borough requires a step change in the delivery of housing, particularly in urban areas. As such settlements and places will need to sensitively evolve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**POLICY 3: HOMES FOR ALL; PAGE 31**

### Mix

It is important that there is sufficient flexibility in this policy to ensure that housing mix/tenure genuinely does take account of the “size, characteristics of the site and location” to ensure that Development sites remain commercially attractive.

Paragraph 4.2.3 is considered to represent a realistic summary position and the Council should support schemes which broadly follow these principles. The Council should not, however, seek to unduly influence the proposed mix.

### Housing for Older People

Supporting text at paragraphs 4.2.9 -4.2.11 recognise the need for; specialist homes for older people as well as residential car and nursing homes. However, this issue needs to be set out more clearly within the policy itself or indeed a standalone policy. Site Allocations and supporting policies also need to take specific account of the needs and requirements of older housing.

The NPPF states at paragraphs 50 and 159 the need to deliver a wide choice of homes to meet the needs of current and future demographic trends and meeting the needs of different groups of the community including older people. The PPG further reinforces this, stating under the heading of ‘Housing and Economic Development Needs Assessments’ that:

“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households

(Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector.”

One of the ‘online tools’ referred to is the Strategic Housing for Older People Analysis Tool (SHOP), provided through the Housing LIN website, which provides a basic tool for forecasting future demand for specialist housing accommodation based either on traditional growth expectations or growth based on increasing life expectancy. This data would indicate the need for extra care accommodation and care beds as follows:

<table>
<thead>
<tr>
<th>Year</th>
<th>Extra Care</th>
<th>Care Home (Nursing)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 – 2015</td>
<td>278</td>
<td>500</td>
</tr>
<tr>
<td>2015 – 2019</td>
<td>285</td>
<td>513</td>
</tr>
<tr>
<td>2020 – 2025</td>
<td>313</td>
<td>563</td>
</tr>
<tr>
<td>2025 – 2030</td>
<td>375</td>
<td>675</td>
</tr>
<tr>
<td>2030 – 2035</td>
<td>413</td>
<td>743</td>
</tr>
</tbody>
</table>
With reference to current provision, the SHOP data shows that at present there are only 164 extra care units provided within the District, and 548 nursing care beds. Assuming that this position remains unaltered the future need for extra care will continue to result in an under supply, whilst for nursing care following 2020 there will also be a deficit.

In the above context, the SHMA (2015) highlights that over the plan period there is a projected increase of 43.5% in the population of residents over 65. As the population is ageing the need to provide housing to meet the varied and complex needs of older people will become a key driver of change in the housing market.

The future population growth of older people must be planned for in order to ensure the provision of sufficient specialist housing to meet identified needs, accordingly we consider that specific sites and/or locations should be included within the Plan. The identification of specific sites can be included as part of the overall housing requirements for the District, even when they fall within a Class C2 definition, as noted in the NPPG as follows:

“Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan.” Paragraph: 037 Reference ID: 3-037-20150320.

A failure to proactively plan for the future housing needs of all groups within the community will result in a greater imbalance in the supply of specialist housing compared to traditional market housing. As well as a demonstrable need for this specialist form of housing, the delivery of this accommodation enables residents to make a conscious decision to ‘rightsize’, choosing a property that suits their care and support needs while removing the potential burden of the upkeep of their existing property. In addition, the delivery of such a scheme provides the opportunity to free up larger under occupied family housing within the local area. These are all added benefits of providing such a development.

Policy H1 needs to provide clearer guidance and support for the provision of housing for older people. It should be recognised that:

- Specific provision should be made for older housing in settlements across the Borough;
- Older person’s accommodation can be delivered at a higher density than family housing and this should be reflected in site density calculations
- Recognition of the role of supported sheltered housing, enhanced and extra care and care communities and villages.

The provision of accommodation for the frail and elderly is loosely wrapped up as part of a recognised need for ‘Specialist Housing’ including housing for; homeless people, people with health issues. This policy approach is, however, considered to be far too broad and does not reflect the growing trend for flexible residential communities for older people which can meet their transitioning needs over time without requiring them to move home or from a wider community/village.

The policy should be amended or a separate policy created to reflect this nuance and to make appropriate provision covering the broad spectrum of needs for older housing.

The Council must allow flexibility to allow for some of the allocated sites to include accommodation for specialist uses. Site A28 should be allocated for C3 and/or C2 uses.

This should be seen to contribute to housing targets, however, where provision is made for care accommodation it should not be burdened by the restrictions of providing affordable housing or the same level of CIL charges as standard market housing. Such accommodation needs to be set as a self-contained community and will typically involve reduced car movements, education constraints and provide more facilities and services on site.

Self-build and custom housebuilding
The Council make only a limited reference to self-build and custom housebuilding at paragraph 4.2.12 where-as this should form part of the specific policy wording.

The text and policy wording should also be positively phrased to encourage the development of self-build housing on both identified and windfall sites. Whilst the Council note that some self-build plots have been allocated within the strategic housing development sites it is considered more likely, that demand for self-build schemes will come forward on smaller scale sites. Accordingly, the Council should ensure that self-build proposals will be supported wherever they are proposed.

Furthermore, the self-build register should provide a guide on where the Council should make appropriate provision for plots, however, this should not be referenced or used to prevent sites coming forward. A flexible approach to self-build development will be key in supporting and encouraging self-build as a productive source of housing supply.

Density

To ensure that the most productive use is made of any site released for development it is recommended that the Council set a minimum baseline density per hectare. It is suggested either a blanket minimum density of 30 dph or potentially a sliding scale between greenfield and brownfield sites.

Our Client supports the identification of site A28 for the development of 62 homes, based on the LAA assessment work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18709 Respondent: 15733665 / Vortal Properties Ltd Agent: Shrimplin Brown (James Brown)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2: AFFORDABLE HOMES

Our Client is supportive of the need to make appropriate provision for affordable housing, however, they wish to make the following specific comments in relation to; the viability and justification of the affordable housing target set out within Policy H2.

Compliance with National Guidance

The Council’s policy does not take account of Paragraph: 031 Reference ID: 23b-031- 20160519 of the NPPG.

This states that there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 20161, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account when formulating new policy.

These circumstances are that;
• Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm;
• In designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty.

1 R on the Application of West Berkshire District Council v Department for Communities and Local Government. Case Number: CO/76/2015

The clear intention and wording of the Ministerial Statement is to ensure that smaller scale development (10 units or less) are not burdened by the need to provide affordable housing or other contributions. This must clearly apply to both financial contributions as well as on-site provision.

For the avoidance of doubt a lower threshold should only be applied in ‘rural areas’ which meet the definition in the Housing Act. This should not include sites within defined settlement boundaries. Our Client cannot, however, see any grounds for a lower target to be applied in the Borough and there is no support for such an approach from the Council’s evidence base.

The Local Plan does not reference the Ministerial Statement and relies on Evidence Base which pre-date the Court of Appeal Decision. The Guildford Borough Council Local Plan Viability and Affordable Housing Study, Final Report, December 2014 references the relevant National Guidance at 2.2.7 to 2.2.12, however, no justification is provided for setting aside the policy provision.

Type of development

It is recognised at 4.2.35 that affordable housing should only be sought from C3 class uses, however, this should be specifically included in the policy wording.

In addition, whilst the subtext specifically excludes residential institutions such as care homes and nursing homes from the definition of C3 class uses, this should be extended to encompass all forms of elderly and retirement accommodation where there would be assistance provided or a community living environment. This should explicitly extend to the inclusion of care villages and other emerging forms of older housing development.

With the growing needs for older housing over the plan period it is anticipated that the type and form of older person housing will evolve rapidly and the plan needs to be adaptable to change.

Flexibility in the application of the target

Although it is agreed that, where possible, a sufficient level of affordable housing should be provided on site, this should be subject to viability considerations and should be assessed on a site specific basis, taking into consideration other regeneration benefits or sites costs. The policy should include a greater degree of inherent flexibility to specifically recognise the need for reduced levels of on-site provision or off-site contributions on sites that would otherwise be undeliverable.

The Council must be certain that the affordable housing target that is ultimately adopted is realistically attainable and will not hold back development. The policy should also include safeguards to prevent the policy being rigidly applied and being used as a brake on development. Particularly in the early years of the Plan where there will be an onus on housing delivery to address the shortfall.

The Council’s Evidence Base work demonstrates the sensitivity of scheme viability to development assumptions. A key driver is the level of CIL. In the absence of a clear position on CIL it is impossible to reach a conclusion on the impact of

Page 1682 of 2988
setting an affordable housing target. The final CIL charging schedule must be brought forward at the same time as the Local Plan for consideration.

**Setting the affordable housing target**

We understand the pressing need for affordable housing within the District and overall our Client supports the approach to extend the requirement across a wider range of sites, taking account of the National limitations on sites of 10 units or less. Our Client considers that the threshold should be set at 11 units or more. There is also no justification for setting an additional area threshold of 0.17 hectares.

It is deemed appropriate that the Council have adopted a level playing field by setting a single fixed target, however, the 40% level is deemed unrealistic particularly in the context that affordable housing completions as a proportion of total supply have only hit 31% of the period 2008-2013. This is without the added burden of a CIL charge.2

It is considered that the proportion of affordable housing should remain consistent with the current policy of 35% with clear flexibility written into the policy to reduce this when development would otherwise be unviable. The policy should also clarify that the affordable threshold should be derived on a ‘net increase of units’ to enable the offset of existing housing stock.

Our Client is concerned that Table 5.7 of the Plan Viability and Affordable Housing Study, 2014 shows that on the assumptions of providing 40% affordable housing and an estimated CIL charge of £100 (the lowest preliminary charging level in the Borough) development in Ash and Tongham would not be viable. Given the identification of over 1,300 units in this area

2 Paragraph 3.2.5 of Local Plan Viability and Affordable Housing Study, December 2014.

...together with the inherent benefits of developing land outside of the Green Belt this evidence warrants further scrutiny and it is suggested that a reduced affordable housing target is applied to land, including site A28, to ensure that the site will come forward.

**Off-site contributions**

The policy text makes no provision for off-site contributions which will be essential on some smaller and medium size schemes (over 10 units) to ensure that they are workable, viable and ultimately deliverable. To be robust the policy must include a specific mechanism within the policy wording to allow offsite contributions in appropriate circumstances. Reference is made to this at paragraphs 4.2.36 – 4.2.37, however, these provisions need to be specifically included within the policy text.

Any formula must also be consulted and tested and should not be left for publication as supplementary guidance.

It must also be recognised that alternative sites cannot always be identified and it is unrealistic to specify that land values for affordable housing must always be provided at nil value.

It is considered that the statement at paragraph 4.2.38 that ‘the vast majority of development in most locations in the Borough are viable providing an affordable housing contribution of 40 per cent.’ Is misleading. The viability work is based on specific scenarios and it is not considered that this provides a reliable basis for the threshold and percentage adopted. It is also a significant concern that the Council’s viability evidence has highlighted that developments in Ash and Tongham would not be viable.

In order to ensure that development comes forward in the short term the approach outlined at paragraph 4.2.39 may only realistically be applied once the plan, and any CIL charge has been adopted. Where land has been acquired or options signed in advance the Council should adopt greater discretion in negotiations.

Finally, Affordable housing is a dynamic sector and accordingly the Council should ensure that this policy does not prejudice the delivery of; key worker or Private Rented Sector schemes which can make schemes in their entirety more accessible.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18716  Respondent: 15733665 / Vortal Properties Ltd  Agent: Shrimplin Brown (James Brown)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY II: INFRASTRUCTURE AND DELIVERY

This policy should define what is meant by strategic sites. Only the largest sites can realistically and effectively provide on-site infrastructure.

The identification and managed delivery of infrastructure by the Council and partners will be essential to support small and medium scale rural schemes which should not be expected to shoulder the burden of nonsite specific infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18710  Respondent: 15733665 / Vortal Properties Ltd  Agent: Shrimplin Brown (James Brown)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1: SURREY HILLS AONB

The specific protection for the Surrey Hills Area of Outstanding Natural Beauty and the Area of Great Landscape Value is fully supported. It is important that these most sensitive parts of the Borough are effectively protected. To ensure that these areas can be effectively protected whilst still ensuring that the Council meet their growth targets it is essential that full and proper use is made of all other potential locations for growth. The identification of Site A38 supports this policy objective and it is imperative that the Plan provides the support and flexibility to ensure that the site can come forward promptly and that its potential is maximised.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18711</th>
<th>Respondent: 15733665 / Vortal Properties Ltd</th>
<th>Agent: Shrimplin Brown (James Brown)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P5: THAMES BASIN HEATHS SPECIAL PROTECTION AREAS**

Our Client considers that in assessing the requirement for mitigation within five and seven kilometres of the SPA the threshold of 50 net new dwellings is too low and would place a further unreasonable restriction on development.

The supporting text states that 80% of visitors come from within seven kilometres of the SPA, however, this does not quantify the proportion from the outer reaches of the zone of influence (5-7 kilometres).

This consideration is more relevant to the larger strategic sites and it is suggested that a threshold of 100 or 150 units should be imposed. Furthermore, the uncertainty presented by the case by case assessment will curtail the delivery of sites and could stifle housing delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18707</th>
<th>Respondent: 15733665 / Vortal Properties Ltd</th>
<th>Agent: Shrimplin Brown (James Brown)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1685 of 2988
POLICY S2: BOROUGH WIDE STRATEGY

The Borough wide strategy sets out the growth targets for housing over the Plan Period. Provision is made for 13,860 new homes; which equates to 693 new homes per year across the Plan Period, based on the conclusions of the SHMA, 2015.

The Annualised Housing Target (AHT) sets out projections for the delivery of 10,395 homes for the period 2018-2019. This, therefore, assumes that the balance of 3,465 homes will have been delivered in the five year period 2013-2018.

The most recent published monitoring report (2014/15, October 2015) shows that for the period 2012/13 through to 2014/15 a total of only 613 homes were delivered. An average of only 204 homes per annum. Paragraph 4.169 of the Housing Delivery Topic Paper, June 2016 (HDTP) states that ‘…completions for 2015/16 are well over 300 homes at nearly 400 homes.’ Taking the upper end figure this still assumes that 2,452 homes will need to be delivered in the two year period 2016/17-2017/18 which, on the basis of previous supply and the Council’s own Annualised housing target is not achievable and will leave a large surplus which is not accounted for in the AHT.

Paragraph 4.156 of the HDTP estimates that the backlog will be 2,019 homes at the point of adoption. This means that the AHT is misleading and the Council should commit to updating this figure prior to adoption to ensure that the AHT represents a credible basis in assessing five year supply. It is suggested that for the Draft Plan the HDTP figure is used which would increase the target for 2018-2033 to 12,414 units.

Table 1 (Page 28) sets out Planned Delivery between 2018 and 2033 and represents a total of 13,652 dwellings. Whilst this is in excess of the AHT figure. 8,381 homes relate to large scale strategic sites and a further 715 represent unidentified; windfall and rural exception sites.

The LAA, February 2016 advises that there is in addition extant planning permission in the Borough for 1,408 new homes (excluding Tannery Works). It should not, however, be automatically assumed that all of this potential capacity will come forward in the Plan Period (243 units relate to consents which were granted over 10 years ago).

The Council’s figures reflect the potential for some additional flexibility to take account of changes in circumstances across the Plan period, however, it is not considered to be a credible position to assume as set out in the LAA (Page 17) that there is potential capacity of 15,116 units, as this relies on the delivery of unidentified sites, 100% completion of all strategic sites and the delivery of all extant consents.

This projected capacity figure should not breed complacency particularly given the backlog highlighted above, and the Council’s acceptance in the short term that they won’t be able to meet the NPPF’s requirements for five year housing supply (paragraphs 4.167-4.174).

Paragraph 4.117 of the HDTP acknowledges this point and states “The Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3…For this reason, it is important that we consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of our supply is backloaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years.” This text should be specifically reflected in the Local Plan text and policies.

It will be for the appointed Inspector to determine the SOUNDNESS of the approach adopted in relation to housing delivery, however, it must be incumbent on the Council to ensure that the site capacity of smaller sites is maximised in order to maximise supply in the early years of the plan.

The release of Site A28 represents just such an opportunity for growth in the early part of the Plan period, within a site to be located within the amended urban area and providing capacity for circa 62 units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
QUESTION 1: THE EVIDENCE BASE AND SUBMISSION DOCUMENTS

The majority of the Evidence Base is considered robust, although the Council have not published an update on CIL. This will be a key document in assessing and evaluating the deliverability of sites and other plan commitments, in particular the level of affordable housing sought from new development.

Our client is particularly concerned that the 40% target for affordable housing provision has been determined on the basis of assumptions from the Preliminary Draft of the CIL Charging Schedule. Furthermore, the affordable housing threshold does not take account of National Guidance (see additional comments on Policy H2 below).

Our client would also question the robustness of the Viability and Affordable Housing Study, Peter Brett Associates, December 2014 which was prepared in the context of a Draft affordable housing policy which had already been set and has now been amended and utilises the preliminary CIL figures.

The Council also acknowledge at Appendix D of the Draft Plan that the Local Housing Needs Surveys for settlements are still being updated. This work will be key in understanding the specific balance of housing needs; including specialist housing and care accommodation (see Policy H1). In the absence of this work the Council must ensure that there is flexibility in the allocated uses in Site Allocations to ensure that specialist needs are met. Our client would draw attention to the fact that no provision has been made for specialist retirement or care development accommodation in the Ash and Tongham area, despite the fact that 1,320 units are proposed in this location.

It is imperative that the Council ensure that:

- That the Evidence Base guidance is reflected in the policy approach adopted unless clear justification for departing from the Evidence base is provided;
- That the Evidence Base relied upon is up to date;
- That the Evidence Base is published at an early enough stage in the process and that stakeholders are afforded an opportunity to comment on it before key policy decisions are fixed

UNSOUND:

The absence of an up to date CIL charging schedule, taking account of responses to the 2015 consultation means that the Council cannot proceed with confidence that the 40% affordable housing target will be achievable.

The absence of the Local Housing Needs Surveys means that specific assessments on housing need or specialist accommodation cannot be made. Accordingly to ensure that the Plan is EFFECTIVE Site Allocations must be flexible in order to allow for a balance of uses to be provided.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a whole our client considers that the Local Plan may be deemed to be legally compliant and sound subject to comments in relation to specific policies which for ease of reference we consider in turn below.

As a general point we are concerned that the Council have failed to “…assess the likely cumulative impacts on development in their area of all existing and proposed local standards…” (Paragraph 174 of the NPPF).

In particular our client has concerns regarding the cumulative impact of: Affordable Homes (Policy H2); Policy D1 (Making Better Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published)

The wider conformity with National guidance is considered individually below in our responses to individual policies.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** SQLP16/2127   **Respondent:** 15733665 / Vortal Properties Ltd   **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**QUESTION 2 AND 3: LEGAL COMPLIANCE AND SOUNDNESS**

As a whole our client considers that the Local Plan may be deemed to be legally compliant and sound subject to comments in relation to specific policies which for ease of reference we consider in turn below.

As a general point we are concerned that the Council have failed to “…assess the likely cumulative impacts on development in their area of all existing and proposed local standards…” (Paragraph 174 of the NPPF).

In particular our client has concerns regarding the cumulative impact of: Affordable Homes (Policy H2); Policy D1 (Making Better Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published)

The wider conformity with National guidance is considered individually below in our responses to individual policies.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2128</th>
<th>Respondent: 15733665 / Vortal Properties Ltd</th>
<th>Agent: Shrimplin Brown (James Brown)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**QUESTION 4: DUTY TO COOPERATE**

Our client have no specific comments to make on the Duty to Co-operate at this stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2129</th>
<th>Respondent: 15733665 / Vortal Properties Ltd</th>
<th>Agent: Shrimplin Brown (James Brown)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**QUESTION 5: EXAMINATION**

Our clients’ in their role as development partner of Site A28 wish to reserve the right to attend the Examination in order to clarify any elements relating to the site allocation and/or the site capacity, appropriate use and/or the implications of any plan policies for the delivery of the allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2130</th>
<th>Respondent: 15733665 / Vortal Properties Ltd</th>
<th>Agent: Shrimplin Brown (James Brown)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
QUESTION 5: EXAMINATION

Our clients’ in their role as development partner of Site A28 wish to reserve the right to attend the Examination in order to clarify any elements relating to the site allocation and/or the site capacity, appropriate use and/or the implications of any plan policies for the delivery of the allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/18706</th>
<th>Respondent:</th>
<th>15733665 / Vortal Properties Ltd</th>
<th>Agent:</th>
<th>Shrimplin Brown (James Brown)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

REPRESENTATIONS BY VORTAL PROPERTIES LTD ON THE GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN STRATEGY AND SITES; JUNE 2016.

Introduction

ShrimplinBrown Ltd are instructed by Vortal Properties Ltd (our client) to submit the following representations to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites document, June 2016.

ShrimplinBrown have undertaken a comprehensive review of the Draft Guildford Local Plan document as well as the relevant supporting evidence base. In accordance with the guidance set out within the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2012, the following representations relate specifically to the “legal compliance” and “soundness” of the draft Local Plan. As well as the specific tests of soundness set out in the NPPF.

These representations relate specifically to our clients’ interest in the development of Site Allocation A28 – Land to the east of White Lane, Ash Green. Specific comments and clarification on the site are set out at the end of these representations.

For ease of reference we have set out our clients’ representations within this single document which addresses the relevant questions set out within the questionnaire and makes clear references to specific; paragraphs, policies and site allocations within the draft plan.

Key Diagram and Proposals Map (Paragraph 1.15)

Whilst the Key Diagram is diagrammatic the maps included in the Appendix serve to identify the boundaries of sites for development as well as amendments to the boundary of villages. Accordingly, these should be set with clear boundaries as part of the identification of Sites.

It is recommended that for clarity that the Final Proposals Map is shown at a higher resolution.

The inclusion of Site A28 within the extended Ash Urban area is supported. The inclusion of the site within the urban area will also be important in ensuring the viability of the proposal.
In relation to Site A28 a larger area of land is available for release which should be included in the allocation (see accompanying plan) and set within the defined Ash Urban Area on the Proposals Map.

**Spatial Vision**

With regard to the reference at Paragraph 3.2: the Corporate Plan only covers a short timeframe 2015-2020 and is principally a mechanism for stimulating short term actions; for example the adoption of the New Local Plan.

Our client considers that the Plan Vision should not be dictated by one source. As the Plan evolves so should the Plan Vision in order to reflect the updating of Evidence Base work and input from consultation responses. Our client has concerns that the Vision does not currently fully reflect the realities of the spatial approach which is by necessity focused on both the release of large significant greenfield sites as well as development within and surrounding towns and villages.

Whilst the release of existing brownfield sites (which may be within either urban or rural locations) may be preferable, the realities of delivering the necessary growth in Guildford Borough is that significant greenfield releases are essential. Also with the current significant deficiencies in the provision of housing in the Borough it is essential that the vision (together with the detailed Plan policies) provides the necessary support to ensure both the timely development and maximisation of the potential of all Site Allocations.

The Plan relies heavily on large strategic releases which will take a significant time to come forward and accordingly this places a greater onus in the short term on supporting the delivery of smaller sites, including land at Ash and Tongham (Site A28) which will be easier and quicker to bring forward.

**Exemplary Design and the Provision of Infrastructure**

Good quality design is important in ensuring that the development created integrates within the existing urban environment and will stand the test of time. Strong infrastructure will also be important to support new growth. However, the plan must be realistic in terms of what may be achieved from smaller sites in order to ensure that over ambitious objectives do not stifle growth or provide a brake on development.

The Council cannot rely solely on new development to meet infrastructure needs and both the Council and statutory providers will also need to contribute in order to address existing deficiencies.

It makes sense to focus initial growth in the plan period within and on the edge of existing settlements. Smaller pockets of development of circa 60 units can be subsumed within existing settlements and help to reaffirm their vitality and viability.

Such development will not normally trigger a need for investment in new infrastructure, beyond any site specific requirements, and will thus be more deliverable earlier in the Plan period and can contribute at an early stage to addressing the Council’s current housing supply deficit.

Furthermore, a high proportion of the Borough is either within the; Green Belt, AONB and AGLV or covered by other local, national and European environmental and heritage designations which limit the potential for development. Whilst significant releases of Green Belt land will be required to meet the Council’s Objectively Assessed Need (OAN) the Plan must embrace the potential, wherever possible, to maximise opportunities on less sensitive land outside of these locations. Land at Site Allocation A28 represents just such an opportunity.

**RECOMMENDATIONS FOR SOUNDNESS**

**UNSOUND:** The reliance on the Corporate Plan is not considered to meet the criteria of being ‘Positively Prepared ’ and ‘Effective’. It is important that the vision is viewed holistically and that no one component is to be afforded any greater or over-riding weight. This point should be made explicitly within the Vision text.

The Plan Vision should be appropriately flexible and should stand alone as a vision for the entire plan period. Given the failure over ten or more years to deliver the necessary levels of housing to satisfy OAN it is essential that the plan provides the conditions for ALL of the housing identified to come forward and quickly. The vision should be amended to emphasise the key role of growth in and around villages (particularly in the early years of the plan) and the need for a flexible approach to development standards.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

|-------------|--------------|-------------|-----------------------------------------------|--------|-----------------------------|

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**LAA, February 2016**

The site was highlighted for development in the LAA. The document notes that the northern part of the site forms part of the built up area of the village and the southern part of the site is visually and physically contained by woodland.

The site is in flood zone 1 (at low risk of fluvial flooding) and the currently open land to the rear is technically located on Grade 3 agricultural land, albeit it has no current or realistic future agricultural potential.

**Green Belt and Countryside Study, 2014**

The Council have undertaken a detailed assessment of the Green Belt and Countryside which has led to the identification of the various revisions to settlement boundaries, including the revisions to the Ripley settlement. The subject site was highlighted in this document as a logical location for the extension of the settlement.

Development of the site would not undermine any of the five NPPF purposes of the Green Belt. The site is not necessary to keep permanently open and its release will ensure that the Green Belt boundaries for the Ripley settlement endure beyond the plan period (NPPF Paras 83-85).

**Landscape and Character Assessment (LACA), 2007**

The site is not within a sensitive location within the LACA and development of the site could contribute positively to enhancing the key characteristics of the ‘Send Gravel Terrace’ landscape character area within which the site is located. The development of the site offers an opportunity to reinforce the historic core of Ripley and the redevelopment scheme would not impact on its distinctive character. The development plot here is well contained by both the existing settlement on the frontage and a mature landscape buffer to the south. Development would clearly not lead to fragmentation of the landscape.

The site already functionally forms part of the settlement and the currently undeveloped land to the east is enclosed on all sides. The development of these sites would form a natural rounding off of the settlement and will offer opportunities to rationalise/strengthen boundary landscaping particularly on the southern boundary of the site.

The site does not make “an important contribution to the openness of the Green Belt” and it is considered that the site performs no Green Belt role and is “unnecessary to keep permanently open.”

**Outline Planning Application**

<table>
<thead>
<tr>
<th>1692</th>
</tr>
</thead>
</table>
Outline proposals were submitted in June 2016 for a scheme comprising 26 residential units and retail on the site frontage, with all matters reserved except for access.

Whilst the application has been refused the principal reason for refusal related to objections on Green Belt policy grounds. Whilst our Client disputes the position adopted by the Council, the proposed amendments in the emerging plan to the village boundary and the insetting of the village from the Green Belt would, in any event overcome the concerns raised.

Technical concerns were also raised relating to the impact on the conservation area and loss of employment. Our Client again disputes the policy approach adopted and the conclusions reached, however, these issues also have no bearing on the site allocation given that they relate to the specific form of development and the merits of protecting existing short term uses.

The other reasons for refusal related to the requirement to secure financial contributions and a commitment to affordable housing. These issues may be addressed through the completion of a S106 agreement and have no bearing on the draft allocation.

Overall, the reasons for refusal relate to the existing policy context and do not undermine the underlying principle of allocating the site for housing.

A technical note with further supporting information accompanies these representations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The specific protection for the Surrey Hills Area Of Outstanding Natural Beauty and the Area of Great Landscape Value is fully supported. It is important that these most sensitive parts of the Borough are effectively protected. To ensure that these areas can be effectively protected whilst still ensuring that the Council meet their growth targets it is essential that full and proper use is made of all other potential locations for growth. The identification of Site Allocation A45 supports this policy objective and the Council are urged to ensure that maximum productive use is made of this site.

SUPPORT POLICY

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Burr Family and Ripley Carriage Ltd own the 0.97 hectare site on land to the Rear of the Talbot, High Street Ripley. The site is located within the heart of the Ripley settlement area and currently comprises:

1. On the frontage; land and buildings associated with the; car sales use and commercial garages;
2. To the south an area of scrubland previously used as a helicopter landing pad for the Talbot Inn Hotel (now in a separate ownership).

The frontage site has been in use for car sales and servicing by the current owner since 1971 and is currently part occupied on a small number of short term tenancies.

The Site is considered to represent the most suitable and logical piece of infill development within Ripley. Development of the site can help to address the specific local development needs for the village as well as providing an appropriate contribution to the Council’s wider District housing target. The site performs no Green Belt function in line with the NPPF tests and as evidenced by the Council’s own Evidence Base represents a suitable location for release from the Green Belt.

The village of Ripley is located to the north east of the District and represents a highly sustainable and vibrant settlement. The settlement is classified as a District Centre and is ranked ninth out of 32 settlements in the Council’s sustainability ranking of settlements, and was ranked particularly strongly in terms of; shops, other community facilities and schools (which provide both a diverse range of services and local employment opportunities).

The settlement also benefits from a village hall, recreational open space, a children’s playground, pubs, restaurants, a dentist. The village is served by a bus service and has excellent direct links to the strategic road network.

The settlement performs an important supporting function for both the immediate local community and smaller surrounding communities. The settlement is, therefore, a logical location for future growth and its needs must be appropriately planned for to maintain its status and future prosperity.

The allocation of Site A45 will help to address local housing needs and will also in part support the plan vision to focus development on brownfield sites.

The Proposals Map identifies the site for development building on the strong recommendations in the Council’s evidence base. The site is to also be included within the amended settlement boundary alongside a recently completed residential infill development on adjoining land.

3 Green Belt and Countryside Study, Volume V 2014
4 Redevelopment scheme for 45 dwellings at White Hart Meadows, Ripley Ref: 12/P/00359

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Technical Note Site A45 inc Appendices.pdf (3.6 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our Client supports the inclusion of Site A45, Land at the rear of the Talbot, High Street, Ripley.

The adjustment of the village boundary and removal of the site from the Green Belt will appropriately realign the settlement boundary to reflect the functional extent of the village. It is considered that the proposed amended boundary would be logical, robust and would create a long term defensible boundary to the Green Belt, in line with the approach set out in the Council’s Evidence Base.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Technical Note Site A45 inc Appendices.pdf](#) (3.6 MB)


Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The broad principles of this policy are supported, however, our Client has some concerns regarding the implications of practically applying some of the potentially ambiguous objectives and how the council may seek to apply these general principles in future detailed development control policies.

Our Client support the objective to deliver high quality design and enhancement of the environment on all new developments. There are, however, a number of aspects of the more prescriptive policy text that should be clarified/adapted as follows:

The threshold of 25 dwellings or more is too low and does not reflect a scale of development which may in all instances:

- Deliver a mix of uses; and
- Provide play, recreation and other public spaces for the local community.

These objectives should be focused on larger scale residential development, particularly in the context of some of the significant sites proposed as part of the Council’s housing supply. A more realistic approach would be to set a threshold of 100 units where these objectives ‘must’ be provided and provide encouragement for these objectives on smaller sites.

That aside the first objective for an “integrated mix of uses” and the provision of facilities and services is an objective which may be achievable on some medium scale sites 20-40 units within central town or village locations. In supporting housing schemes through infill development and the rounding off of village settlements there will be a clear role in ensuring the provision of new supporting services and facilities. Site A45 represents an opportunity to provide housing alongside new retail or commercial use.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is important that new development achieves a good level of design that respects existing character, however, the Council have a balancing exercise to ensure that they make the maximum productive use of identified sites in order to ensure that the most important ‘natural, built and heritage environments are protected.’ Including making maximum use of sustainably located sites within and adjoining existing settlements.

The Council must also be careful to ensure that unrealistic design standards or the constraints of historic character do not undermine the delivery of new growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A number of parts of the Borough do not have a Conservation Area Character Appraisal; including the Ripley Conservation Area.

To ensure the robustness of this policy the Council should produce an Appraisal which takes account of the proposed changes to the settlement boundary and planned future development.

With regard to undesignated assets these should be reviewed in light of the challenges posed by the current Plan Review process. Such assets should not prejudice the delivery of new development.
The principal of expanding and in-setting the village of Ripley from the Green Belt and the identification of Site Allocation A45 is supported.

However, whilst the overall objectives of the policy guidance set out at Policy D4 are acknowledged and broadly supported by Our Client it is considered that the tone of the policy could serve to curtail rather than encourage the development of the specific site allocations identified in the Plan. Paragraph 4.5.46 suggests that the policy is targeted to windfall opportunities, however, the wording could still be applied to ‘all new development’ including site allocations. Our Client contend that this would undermine the delivery of Site Allocations and impact on the delivery of the Council’s housing target.

The expansion and development of edge of settlement sites will necessitate some changes in scale, massing and height. It will also be necessary to build at increased densities in order to ensure the most effective use of land. Whilst it will be important to ensure that new development successfully integrates within areas and does not impact on the amenities of neighbours the Borough requires a step change in the delivery of housing, particularly in urban areas. As such settlements and places will need to sensitively evolve.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This policy places an unnecessary level of restriction in proposing to place significant restrictions on the loss of floorspace outside of ‘designated employment sites.’

The best employment sites have been assessed as part of the Evidence Base and are specifically protected. Policies E1 and E2 also reflect the guidance of the NPPF and are positively worded. Policy E3, however, goes too far and does not reflect the guidance set out at paragraph 22 of the NPPF. The subtext, paragraph 4.4.25 refers specifically to the loss of office space as a driver for retaining employment land, however, the Council should consider other more specifically targeted mechanisms to protect office space e.g. Article 4 direction.

The reliance on marketing for a period of 12 months will stifle redevelopment for other uses, in particular residential development. The prescriptive guidance at paragraph 4.4.27 is also too draconian and has no place in positive plan making.

Any restrictions on designated sites should also allow for a balanced judgement to be made including impact on neighbouring uses and other considerations, including the Council’s current housing supply position.

Alternative use should also not be prejudiced by the need to assess any other suitable employment use prior to residential use.

Importantly, the policy should make it explicitly clear that these restrictions should not apply to any Site Allocations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---


Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The identification of Ripley as a District Centre is supported, however, the opportunities to expand the facilities, shops and services in Ripley are limited.

Site Allocation A45: Land at the rear of the Talbot, High Street, Ripley provides an opportunity to deliver 90 sqm of new floorspace within the shopping frontage. The Council should include this additional floorspace on the Table at Page 28.

The policy should, however, allow flexibility for new units to come forward for a flexible range of; A1, A2, A3, A4, A5, B1a or D class uses. These uses will support the vitality and viability of the District centre.

**SUPPORT subject to an amendment to the text stating: “In order to strengthen the liveliness and economic resilience of the borough’s District Centres, retail developments or other suitable District Centre uses including restaurants, takeaways, small scale offices and community uses, consistent with the scale and function of that centre, will be supported in the Primary Shopping Area.”**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Mix

It is important that there is sufficient flexibility in this policy to ensure that housing mix/tenure genuinely does take account of the “size, characteristics of the site and location” to ensure that Development sites remain commercially attractive.

Paragraph 4.2.3 is considered to represent a realistic summary position and the Council should support schemes which broadly follow these principles. The Council should not, however, seek to unduly influence the proposed mix.

Density

To ensure that the most productive use is made of any site released for development it is recommended that the Council set a minimum baseline density per hectare. It is suggested that the policy adopts a blanket minimum density of 30 dph.

In line with this approach the capacity for Site Allocation A45 should be increased to circa 30 units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Our Client is supportive of the need to make appropriate provision for affordable housing, however, they wish to make the following specific comments in relation to; the viability and justification of the affordable housing target set out within Policy H2.

Compliance with National Guidance

The Council’s policy does not take account of Paragraph: 031 Reference ID: 23b-031-20160519 of the NPPG.

This states that there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal judgement dated 13 May 2016, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014. This guidance must be taken into account in formulating a new affordable housing policy.

These circumstances are that;

- Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm
- In designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development. This applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty.

The clear intention and wording of the Ministerial Statement is to ensure that smaller scale development (10 units or less) is not burdened by the need to provide affordable housing or other contributions. This must clearly apply to both financial contributions as well as on-site provision.

For the avoidance of doubt a lower threshold should only be applied in ‘rural areas’ which meet the definition in the Housing Act. This should not include sites within defined settlement boundaries i.e. Ripley should not be classified as a rural area. In any event our client cannot see any grounds for a lower target to be approved in the Borough, and there is no support for such an approach in the Council’s evidence base.

The Local Plan does not reference the Ministerial Statement and relies on Evidence Base which pre-date the Court of Appeal Decision. The Guildford Borough Council Local Plan Viability and Affordable Housing Study, Final Report, December 2014 references the relevant National Guidance at 2.2.7 to 2.2.12, however, no justification is provided for setting aside the policy provision.

Flexibility in the application of the target

Although it is agreed that, where possible, a sufficient level of affordable housing should be provided on site, this should be subject to viability considerations and should, on a site specific basis, take into consideration other regeneration benefits or sites costs. The policy should include a greater degree of inherent flexibility to specifically recognise the need for reduced levels of on-site provision or off-site contributions on sites that would otherwise be undeliverable.

The Council must be certain that the affordable housing target that is ultimately adopted is realistically attainable and will not hold back development. The policy should also include safeguards to prevent the policy being rigidly applied and being used as a brake on development.

The Council’s Evidence Base work demonstrates the sensitivity of scheme viability to development assumptions. A key driver is the level of CIL. In the absence of a clear position on CIL it is impossible to reach a conclusion on the impact of setting a higher affordable housing target than existing.

Setting the affordable housing target
We understand the pressing need for affordable housing within the District and overall our Client supports the approach to extend the requirement across a wider range of sites, taking account of the National limitations on sites of 10 units or less. Our Client considers that the threshold should be set at 11 units. Also there is also no justification for setting an area threshold of 0.17 hectares.

It is deemed appropriate that the Council have adopted a level playing field by setting a single fixed target, however, the 40% level is deemed unrealistic particularly in the context that affordable housing completions as a proportion of total supply have only hit 31% of the period 2008-2013 (paragraph 3.2.5 Local Plan Viability and Affordable Housing Study, December 2014). This is without the added burden of a CIL charge.

It is considered that the proportion of affordable housing should remain consistent with the current policy of 35% with clear flexibility written into the policy to reduce this when development would otherwise be unviable. The policy should also clarify that the affordable threshold should be derived on a ‘net increase of units’ to enable the offset of existing housing stock.

**Off-site contributions**

The policy text makes no provision for off-site contributions which will be essential on some smaller and medium size schemes (over 10 units) to ensure that they are workable, viable and ultimately deliverable. To be robust the policy must include a specific mechanism within the policy wording to allow offsite contributions in appropriate circumstances. Reference is made to this at paragraphs 4.2.36 – 4.2.37, however, there needs to be a specifically included within the policy text.

Any formula must also be consulted and tested and should not be left for publication as supplementary guidance.

It must also be recognised that alternative sites cannot always be identified and it is unrealistic to specify that land values for affordable housing must always be provided at nil value.

It is considered that the statement at paragraph 4.2.38 that ‘the vast majority of development in most locations in the Borough are viable providing an affordable housing contribution of 40 per cent.’ Is misleading. The viability work is based on specific scenarios and it is not considered that this provides a reliable basis for the threshold and percentage adopted.

In order to ensure that development comes forward in the short term the approach outlined at paragraph 4.2.39 may only realistically be applied once the plan, and any CIL charge has been adopted. Where land has been acquired or options signed in advance the Council should adopt greater discretion in negotiations to ensure that land will come forward in a timely manner.

Finally, Affordable housing is a dynamic sector and accordingly the Council should ensure that this policy does not prejudice the delivery of; key worker or Private Rented Sector schemes which can make schemes in their entirety more accessible.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Our Client consider that within the context of a Spatial approach that looks to identify the most sustainable locations within village settlements there is little merit in maintaining a rural exception homes policy.

As an alternative it is considered to be a more robust strategy to specifically allocate all of the suitable sites within or immediately adjoining the defined village settlement boundaries in order to directly contribute to the Council’s housing target. This is more likely to achieve the target of 90 units than from currently unidentified rural housing schemes which are likely to be few and far between.

Nonetheless, if this policy is to be maintained, in order for it to be realistically workable, the ability to include public subsidy within a rural exception scheme, as outlined in paragraph 4.2.52, should be specifically written into the policy text. Furthermore, the Council should not impose artificial limits on the level of market housing needed to support rural housing schemes but should objectively consider any scheme which seeks to deliver affordable units above the adopted policy target.

The additional caveats set out under paragraphs 4.2.53 and 4.2.54 are not considered to be justifiable and serve to further undermine the workability of this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The specific protection for the Surrey Hills Area Of Outstanding Natural Beauty and the Area of Great Landscape Value is fully supported. It is important that these most sensitive parts of the Borough are effectively protected. To ensure that these areas can be effectively protected whilst still ensuring that the Council meet their growth targets it is essential that full and proper use is made of all other potential locations for growth. The identification of Site Allocation A45 supports this policy objective and the Council are urged to ensure that maximum productive use is made of this site.

**SUPPORT POLICY**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Our Client fully supports the proposal to expand village settlement boundaries and inset specific villages from the Green Belt, including Ripley. This is essential to ensure that the Council maximise the opportunities for housing delivery, particularly in the earlier years of the Local Plan.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**SUPPORT POLICY**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The Borough wide strategy sets out the growth targets for housing over the Plan Period. Provision is made for 13,860 new homes; which equates to 693 new homes per year across the Plan Period, based on the conclusions of the SHMA, 2015.

The Annualised Housing Target (AHT) sets out projections for the delivery of 10,395 homes for the period 2018-2019. This, therefore, assumes that the balance of 3,465 homes will have been delivered in the five year period 2013-2018.

The most recent published monitoring report (2014/15, October 2015) shows that for the period 2012/13 through to 2014/15 a total of only 613 homes were delivered. An average of only 204 homes per annum. Paragraph 4.169 of the Housing Delivery Topic Paper, June 2016 (HDTP) states that ‘…completions for 2015/16 are well over 300 homes at nearly 400 homes.’ Taking the upper end figure this still assumes that 2,452 homes will need to be delivered in the two year period 2016/17- 2017/18 which; on the basis of previous supply and the Council’s own Annualised housing target is not achievable and will leave a large surplus which is not accounted for in the AHT.

Paragraph 4.156 of the HDTP estimates that the backlog will be 2,019 homes at the point of adoption. This means that the AHT is misleading and the Council should commit to updating this figure prior to adoption to ensure that the AHT represents a credible basis in assessing five year supply. It is suggested that for the Draft Plan the HDTP figure is used which would increase the target for 2018-2033 to 12,414 units.

Table 1 (Page 28) sets out Planned Delivery between 2018 and 2033 and represents a total of 13,652 dwellings. Whilst this is in excess of the AHT figure. 8,381 homes relate to large scale strategic sites and a further 715 represent unidentified; windfall and rural exception sites.

The LAA, February 2016 advises that there is in addition extant planning permission in the Borough for 1,408 new homes (excluding Tannery Works). It should not, however, be automatically assumed that all of this potential capacity will come forward in the Plan Period (243 units relate to consents which were granted over 10 years ago).

The Council’s figures reflect the potential for some additional flexibility to take account of changes in circumstances across the Plan period, however, it is not considered to be a credible position to assume as set out in the LAA (Page 17) that there is potential capacity of 15,116 units, as this relies on the delivery of unidentified sites, 100% completion of all strategic sites and the delivery of all extant consents.

The projected capacity figure should not breed complacency, particularly given the backlog highlighted above and the Council’s acceptance that they won’t be able to meet the NPPF’s requirements for five year housing supply (paragraphs 4.167- 4.174.

Paragraph 4.117 of the HDTP acknowledges this point and states “The Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3…For this reason, it is important that we consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of our supply is backloaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years.”

It will be for the appointed Inspector to determine the SOUNDNESS of the approach adopted in relation to housing delivery, however, it must be incumbent on the Council to ensure that the site capacity of smaller sites is maximised in order to maximise supply in the early years of the plan.

The development of Site A45 would also fulfil the objective set out at Para 4.118 of HDTP to “Maintain the Green Belt by limiting growth to those sites that are located in Green (low sensitivity land parcels) only”. Furthermore, maximum use should be made of suitable sites within and adjoining villages as these sites will be deliverable more readily and earlier in the plan period than the large strategic designations.

In focusing on the low sensitivity land it is, however, vitally important that the most effective use is made of those sites when they are released and developed. Our Client considers that more effective use could be made of Site Allocation A45 and that a more realistic density would be circa 30 units. The boundaries of the site should also be increased to include the full site area of 0.95 Hectares (see attached Plan, Ref: A15517.01.01A).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The majority of the Evidence Base is considered robust, although the Council have not published an update on CIL. This will be a key document in assessing and evaluating the deliverability of sites and other plan commitments, in particular the level of affordable housing sought from new development.

Our Client is particularly concerned that the 40% target for affordable housing provision has been determined on the basis of assumptions from the Preliminary Draft of the CIL Charging Schedule, 2015. Furthermore, the affordable housing threshold does not take account of National Guidance (see additional comments on Policy H2 below).

Our Client would also question the robustness of the Viability and Affordable Housing Study, Peter Brett Associates, December 2014 which was prepared in the context of a Draft affordable housing policy (now amended in the Proposed Submission Draft Local Plan) and which utilises the preliminary CIL figures.

The Council also acknowledge at Appendix D of the Draft Plan that the Local Housing Needs Surveys for settlements are still being updated. This work will be key in understanding the specific balance of housing needs and the specific local housing requirements.

It is imperative that the Council ensure that:

- The Evidence Base guidance is reflected in the policy approach adopted unless clear justification for departing from the Evidence base is provided;
- The Evidence Base relied upon is up to date;
- The Evidence Base is published at an early enough stage in the process and that stakeholders are afforded an opportunity to comment on it before key policy decisions are fixed locally. This is particular relevant in evaluating the viability of the affordable housing threshold in isolation from a draft CIL charging schedule.

**UN SOUND:**

The absence of an up to date CIL charging schedule, taking account of responses to the 2015 consultation, means that the Council cannot proceed with confidence that the 40% affordable housing target will be achievable.

The absence of the Local Housing Needs Surveys means that specific assessments on housing need, local housing requirements or specialist accommodation cannot be made. Accordingly, to ensure that the Plan is EFFECTIVE Site Allocations must be flexible in order to ensure that local need is satisfied and the appropriate balance of uses are provided.
As a whole our Client considers that the Local Plan may be deemed to be legally compliant and sound subject to comments in relation to specific policies which for ease of reference we consider in turn below.

As a general point we are concerned that the Council have failed to “…assess the likely cumulative impacts on development in their area of all existing and proposed local standards…” (Paragraph 174 of the NPPF).

In particular our Client has concerns regarding the cumulative impact of; Affordable Homes (Policy H2); Policy D1 (Making Better Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published).

The wider conformity with National guidance is considered individually below in our responses to individual policies.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Page 1706 of 2988
As a whole our Client considers that the Local Plan may be deemed to be legally compliant and sound subject to comments in relation to specific policies which for ease of reference we consider in turn below.

As a general point we are concerned that the Council have failed to “…assess the likely cumulative impacts on development in their area of all existing and proposed local standards…” (Paragraph 174 of the NPPF).

In particular our Client has concerns regarding the cumulative impact of; Affordable Homes (Policy H2); Policy D1 (Making Better Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published)

The wider conformity with National guidance is considered individually below in our responses to individual policies.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** SQLP16/1911  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Our Client have no specific comments to make on the Duty to Co-operate at this stage.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** SQLP16/1912  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Our Client wishes to reserve the right to attend the Examination. They are the owner of Site A45 Land to the rear of the Talbot, High Street, Ripley and thus wish to reserve the right to attend the Examination in order to; clarify any elements relating to the site allocation, site capacity and/or the implications of any plan policies for the delivery of the allocation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/17161  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

ShrimplinBrown Ltd are instructed by The Burr Family and Ripley Carriage Ltd (our client) to submit the following representations to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites document, June 2016.

ShrimplinBrown have undertaken a comprehensive review of the Draft Guildford Local Plan document as well as the relevant supporting evidence base. In accordance with the guidance set out within the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2012, the following representations relate specifically to the “legal compliance” and “soundness” of the draft Local Plan. As well as the specific tests of soundness set out in the NPPF.

Our client are the owners of Site Allocation A45: Land to the rear of the Talbot, High Street, Ripley. These representations should be read in conjunction with the attached summary information which provides further analysis of the site and its capacity for redevelopment.

For ease of reference we have set out our representations within this single document which addresses the relevant questions set out within the questionnaire and makes clear references to specific; paragraphs, policies and site allocations within the draft plan.

**Key Diagram and Proposals Map (Paragraph 1.15)**

Whilst the Key Diagram is diagrammatic the maps included in the Appendix serve to identify the boundaries of sites for development as well as amendments to the boundary of villages. Accordingly, these should be set with clear boundaries as part of the identification of Sites.

It is recommended that for clarity that the Final Proposals Map is shown at a higher resolution.

The inclusion of Site A45 as a Proposed Site Allocation and as part of the extended and inset Ripley village boundary is supported.

**Spatial Vision**

Paragraph 3.2: The Corporate Plan only covers a short timeframe 2015-2020 and is principally a mechanism for stimulating short term actions; for example the adoption of the New Local Plan.

Our Client considers that the Plan Vision should not be dictated by one source. As the Plan evolves so should the Plan Vision in order to reflect the updating of Evidence Base work and input from consultation responses. Our Client has
concerns that the Vision does not currently fully reflect the realities of the spatial approach which is by necessity focused on both the release of large significant greenfield sites together with the expansion of towns and villages to facilitate new growth.

Whilst the release of existing brownfield sites (which may be within either urban or rural locations) may be preferable, the realities of delivering the necessary growth in Guildford Borough is that significant greenfield releases are essential. Also with the current significant deficiencies in the provision of housing in the Borough it is essential that the Adopted Plan provides the necessary support to ensure both the timely development and maximisation of the potential of all Site Allocations.

The Plan relies heavily on large strategic releases which will take a significant time to come forward, and accordingly this places greater onus on the need, particularly in the short to medium term, to support the delivery of smaller sites which will often be easier and quicker to bring forward. The amendments to village boundaries (including Ripley), their insetting from the Green Belt and the identification of specific sites, including Site A45, will be important in supporting early releases.

**Exemplary Design and the Provision of Infrastructure**

Good quality design is important in ensuring that the development created integrates within the existing urban environment and will stand the test of time. Strong infrastructure will also be important to support new growth. However, the plan must be realistic in terms of what may be achieved from smaller sites in order to ensure that over ambitious objectives do not stifle growth or provide a brake on development.

The Council cannot rely solely on new development to meet infrastructure needs and both the Council and statutory providers will also need to contribute in order to address existing deficiencies.

It makes sense to focus initial growth in the plan period within and on the edge of existing settlements. Smaller pockets of development of up to 50 units can be subsumed within existing settlements and help to reaffirm their vitality and viability.

Such development will not normally trigger a need for significant investment in new infrastructure, beyond any site specific requirements, and will thus be more deliverable earlier in the Plan period and can contribute at an early stage to addressing the Council’s current housing supply deficit.

It is important that the vision is viewed holistically and that no one component is to be afforded any greater or over-riding weight. This point should be made explicitly within the Vision text.

The Plan Vision should also adopt a holistic approach to new growth which maximises the opportunities to group together wherever possible; new housing with jobs and supporting services. Ripley is a prime location to fulfil this objective. Site A45 offers the potential for housing development during an early stage of the Plan Period and will also satisfy in part the objective of developing on previously developed land.

To comply with guidance within the NPPF and reflect the approach set out within the Council’s Evidence Base (i.e. SHLAA, GBCS) the Council should state a clear priority for the redevelopment of previously developed land and sites within or on the edge of existing settlements prior to the wider expansion sites or new settlement growth. A high proportion of the Borough is either within the AONB and AGLV or covered by other local, national and European environmental and heritage designations which limit the potential for development. In this context the potential to focus growth on less sensitive land outside of these locations, including Site Allocation A45: Land to the rear of the Talbot, High Street, Ripley, should be maximised.

**UNSOUND:**

The reliance on the Corporate Plan is not considered to meet the criteria of being ‘Positively Prepared’ and ‘Effective’. The Plan Vision should be appropriately flexible and should stand alone as a vision for the entire plan period. Given the failure over ten or more years to deliver the necessary levels of housing to satisfy demand it is essential that the plan provides the conditions for ALL of the identified Site Allocations to come forward as quickly as possible. The vision should be amended to emphasise the key role of growth in the villages (particularly in the early years of the plan) and the need for a flexible approach to development standards.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Technical Note Site A45 inc Appendices.pdf (3.6 MB)


Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1: PLACE SHAPING

1.79 The broad principles of this policy are supported, however, our Client continues to have some concerns regarding the implications of practically applying some of the potentially ambiguous objectives and how the council may seek to apply these general principles in future detailed development control policies.

1.80 Our Client support the objective to deliver high quality design and enhancement of the environment on all new developments. There are, however, a number of aspects of the more prescriptive policy text that should be clarified/adapted as follows:

1.81 The Council have not addressed the previous concerns raised regarding the proposed threshold of 25 dwellings. The threshold is set too low and does not reflect a scale of development which may in all instances:

• Deliver a mix of uses; and
• Provide play, recreation and other public spaces for the local community.

1.82 These objectives should be focused on larger scale residential development, particularly in the context of some of the significant sites proposed as part of the Council’s housing supply. A more realistic approach would be to set a threshold of 100 units where these objectives ‘must’ be provided and provide encouragement for these objectives on smaller sites.

UNSOOUND: As currently drafted the policy could limit the deliverability and potential of smaller sites and as such would fail the test of being Positively Prepared or Effective.

Recommended Change: Increase the policy threshold to 100 units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4: CHARACTER AND DESIGN OF NEW DEVELOPMENT

1.86 Whilst the overall objectives of the updated policy guidance set out at Policy D4 are acknowledged and broadly supported by our client it is considered that the tone of the amended policy is now even more likely to serve to curtail rather than encourage the development of the specific site allocations identified in the Plan.

1.87 The Council do provide some much-needed clarity in broadening the policy to refer to all new development, however, our Client remain concerned that the policy has the potential to undermine the delivery of Site Allocations and impact on the delivery of the Council’s housing target.

1.88 The distilled reference to site density in this policy (moved from Policy H1- see earlier comments) when read in the context of the other policy restrictions will not serve to maximise the potential of the specifically identified site allocations. The policy should make a clear commitment to a density target which would be more clearly set out in Policy H1. It should also be made clear that the Site Allocations are expected to meet the projected density targets set out in the Pro-formas as a minimum.

1.89 The expansion and development of edge of settlement sites will necessitate some changes in scale, massing and height. It will also be necessary to build at increased densities in order to ensure the most effective use of land. Whilst it will be important to ensure that new development successfully integrates within areas and does not impact on the amenities of neighbours the Borough requires a step change in the delivery of housing, particularly in urban areas. As such settlements and places will need to sensitively evolve. Policy D4 in conjunction with Policy H1 needs to provide more of a driver for development.

UN Sound: As currently drafted the policy will not be EFFECTIVE in securing the delivery of Site Allocations. It is suggested that the relevant aspects of the policy are re-worded as follows.

“High quality design is expected in the borough. All developments will:

d) Take appropriate account of the; existing grain street pattern, layout, scale, form, massing, height and materials of surrounding buildings and structures;

e) Deliver a minimum density of 30 dwellings per hectare on all allocated sites to ensure the most efficient use of the land. Unallocated sites should target a minimum density of 30 dwellings per hectare unless this would be of significant detriment to local character and context

l) Conserve, and where possible enhance designated heritage assets

m) Ensure that the amenities enjoyed by the occupants of buildings are protected.”

And the following additional text added for clarity:

“Development will be deemed acceptable in principle for all of the Site Allocations identified at pages 123-126. The approximate site densities should be achieved wherever possible subject to compliance with other plan policies.

The criteria set out for new development should also not serve as a brake on the delivery of Site Allocations.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.68 The revised policy wording continues to place an unnecessary level of restriction on the loss of floorspace outside of ‘designated employment sites.’

1.69 The best employment sites have been assessed as part of the Evidence Base and it is proposed will be subject to extensive protection.

1.70 Policies E1 and E2 reflect the guidance of the NPPF and are positively worded. Policy E3, however, goes too far and does not reflect the guidance set out at paragraph 22 of the NPPF. The subtext, paragraph 4.4.25 refers specifically to the loss of office space as a driver for retaining employment land, however, the Council could consider other more specifically targeted mechanisms to protect office space e.g. An Article 4 direction.

1.71 The reliance on marketing for a period of 12 months will stifle redevelopment for other uses, in particular residential development. The prescriptive guidance at paragraph 4.4.27 is also too draconian and has no place in positive plan making.

1.72 The quality and location of employment land should also play a role in decision making and the Council must also allow for a balanced judgement to be made to include an assessment of the impact on neighbouring uses and the pressing need for other forms of development, most notably housing.

1.73 As set out in the Guildford Borough Employment Land Needs Assessment 2017 (Page ii) there is a healthy existing pipeline of 38,357 sqm of consented floorspace for B1c, B2 and B8 uses.

1.74 Alternative use should also not be prejudiced by the need to assess any other suitable employment use prior to residential use.

1.75 Most crucially, the policy still fails to make it explicitly clear that these restrictions will not apply to Site Allocations where these are designated for alternative uses.

UN SOUND: The wording of the Third Bullet point should be amended as follows:

• Employment floorspace which is not otherwise allocated for development in the Plan will be protected in line with latest need assessments. Redevelopment to alternative use will be permitted where it can be demonstrated that; there is no longer a requirement for employment use, the site is no longer suitable for employment uses or the site has a negative impact on surrounding uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8: DISTRICT CENTRES

1.76 The identification of Ripley as a District Centre is supported, however, the current opportunities to expand the facilities, shops and services in Ripley are limited.

1.77 Site Allocation A45: Land at the rear of the Talbot, High Street, Ripley provides a rare opportunity to deliver 90 sqm of new floorspace within the shopping frontage.

1.78 The specific support for both retail and ‘other main town centre uses’ within the Borough District Centres is supported. For clarity the Council should make it clearer what uses will be specifically supported. The definition at 4.4.87b is deemed to be largely irrelevant for the District Centres identified and accordingly it would be more realistic to set out a range of realistically deliverable uses which would logically include D Class uses and also in appropriate circumstances office use (B1a)

SUPPORT subject to an amendment to the text stating: “In order to strengthen the liveliness and economic resilience of the borough’s District Centres, retail developments or other suitable District Centre uses including; restaurants, takeaways, small scale offices and community uses, consistent with the scale and function of that centre, will be supported in the Primary Shopping Area.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1: HOMES FOR ALL; PAGE 31

1.48 The proposal to delete the reference to Density in this policy is considered UNSOUND as it will undermine the effective delivery of sites. The reference to Density should be reinstated and the policy wording expanded to set a minimum baseline density per hectare. It is suggested that the policy adopts a blanket minimum density of 30 dph.

1.49 This will ensure that the most productive use is made of any site released for development.

1.50 In line with this approach the capacity for Site Allocation A45 should be increased to circa 30 units.
1.51 The proposed limited reference to Density in Policy D4 does not address these concerns.

SOUNDNESS: To ensure the EFFECTIVE delivery of sites the Council should ensure that Density figures for allocated sites make full use of site potential and should be based on robust analysis.

UN Sound: The Policy wording should be adapted to include reference to a minimum baseline density per hectare. To reflect the current housing shortfall it is suggested that this is set as a minimum 30 dph.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---


Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2: AFFORDABLE HOMES

1.52 Our Client is supportive of the need to make appropriate provision for affordable housing, however, they are concerned that previous comments relating to viability and the justification of the affordable housing target set out within Policy H2 have been overlooked.

Flexibility in the application of the target

1.53 The revised policy wording still does not include any flexibility to specifically recognise the need for reduced levels of on-site provision or off-site contributions on sites that would otherwise be undeliverable.

1.54 The Council must be certain that the affordable housing target that is ultimately adopted is realistically attainable and will not hold back development. The policy should also include safeguards to prevent the policy being rigidly applied and being used as a brake on development.

1.55 The Council’s Evidence Base work demonstrates the sensitivity of scheme viability to development assumptions. A key driver is the level of CIL. In the absence of a clear position on CIL it is impossible to reach a clear conclusion on the impact of setting a higher affordable housing target than existing.

1.56 It is considered that the statement at paragraph 4.2.38 that ‘the vast majority of development in most locations in the Borough are viable providing an affordable housing contribution of 40 per cent.’ is misleading. The viability work is based on specific scenarios and it is not considered that this provides a reliable basis for the threshold and percentage adopted.

1.57 In order to ensure that development comes forward in the short term the approach outlined at paragraph 4.2.39 may only realistically be applied once the plan, and any CIL charge has been adopted. Where land has been acquired or options signed in advance the Council should adopt greater discretion in negotiations to ensure that land will come forward in a timely manner.

1.58 There is some recognition in the sub-text at paragraph 4.2.40 that there will be instances where the tenure mix or number of affordable homes requested cannot be met. This flexibility should be specifically written in to the policy text.
with a clear and reasonable test set out for assessing scheme viability (see below).

Setting the affordable housing target

1.59 It is deemed appropriate that the Council have adopted a level playing field by setting a single fixed target, however, the 40% level is deemed unrealistic particularly in the context that affordable housing completions as a proportion of total supply have only hit 31% of the period 2008-2013 (paragraph 3.2.5 Local Plan Viability and Affordable Housing Study, December 2014). This is without the added burden of a CIL charge. In light of the wider pressures facing housing delivery affordable housing cannot form a further brake on development.

1.60 It is considered that the proportion of affordable housing should remain consistent with the current policy of 35% with clear flexibility written into the policy to reduce this when development would otherwise be unviable. The policy should also clarify that the affordable threshold should be derived on a ‘net increase of units’ to enable the offset of existing housing stock.

Off-site contributions

1.61 It is recognised that the policy does now allow specifically within the policy text for the provision of off-site contributions in certain circumstances, however, this is only where on-site provision would be impractical or the location of the development is unsuitable.

1.62 Any formula for assessing off-site contributions must also be consulted and tested and should not be left for publication as supplementary guidance.

1.63 Finally, Affordable housing is a dynamic sector and accordingly the Council should ensure that this policy does not prejudice the delivery of; key worker or Private Rented Sector schemes which can make schemes in their entirety more accessible.

UNSOUnd: The published Affordable Housing Evidence Base is not considered to provide the necessary justification for the 40% target.

It is suggested that the 40% target is reduced to 35%

Flexibility must be included within the policy wording to enable a reduction of on-site provision and/or off-site contributions where these would undermine the delivery of housing supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1.66 Our Client continues to fully support the proposal to expand village settlement boundaries and inset specific villages from the Green Belt, including Ripley. This is essential to ensure that the Council maximise the opportunities for housing delivery, particularly in the earlier years of the Local Plan.

1.67 However, the inclusion of Ripley as a settlement where only ‘Limited Infilling within the identified settlement boundaries’ is to be permitted is confusing and could conflict with the intention to inset the majority of the village from the Green Belt.

PARTIALLY SUPPORT POLICY- The policy needs to be clarified to confirm that limited infilling in Ripley will apply only to those areas NOT inset from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2: BOROUGH WIDE STRATEGY

1.33 The updated policy sets out the growth targets for housing over the Plan Period. Provision is now to be made for a reduced target of 12,426 new homes; which equates to 654 new homes per year across the Plan Period, based on the conclusions of the West Surrey SHMA: Guildford Addendum Report (2017).

1.34 The Annualised Housing Target (AHT) sets out projections for the delivery of 9,810 homes for the period 2019-2034. This, therefore, leaves a shortfall of 2,616 homes.

1.35 The most recent published monitoring report (2015/16, October 2016) shows that for the period 2015/16, 388 homes were delivered, and paragraph 2.9 of the Guildford Borough Topic Paper, Housing Delivery, June 2017 states that only 297 homes were delivered in 2016/17. This leaves 1,931 homes to be delivered over the remaining two monitoring years (965 homes per annum).

1.36 This is not, however, realistic based on current rates of delivery. Over the period 2012/13 to 2015/16 only 1,001 homes were delivered, an average of only 250 homes per annum. This includes a significant uplift in 2015/16.

1.37 The plan does not, therefore, actually plan for the delivery of the reduced housing target of 12,426 homes and at the point of adoption there will be a large surplus not accounted for in the Council’s own Annualised housing target (AHT).

1.38 Paragraph 4.188 of the Housing Delivery Topic Paper (HDTTP), June 2017 estimates that the backlog will be 1,319 homes at the point of adoption. This means that the AHT is misleading and the Council should commit to updating this figure prior to adoption to ensure that the AHT represents a credible basis in actually committing to delivering the full housing target during the plan period. The reference at paragraph 4.1.9b to taking account of the deficit accrued until that point does not include the backlog at the point of adoption.
1.39 It is suggested that for the Submission Plan the HDTP projected backlog figure is included in the AHT which would increase the overall target for 2019-2034 to 11,129 units.

1.40 This is particularly important given the recognition that the Council do not envisage being able to meet their projected annual housing target until 2026/2027.

1.41 Assuming that the Council’s projected rates of delivery are achieved the Council are by this time committing to an additional backlog of 1,028 units. Adding this to the shortfall at adoption would mean a backlog of 2,347 units (3.58 years) to be addressed in the last eight years of the Plan. This would mean committing to the delivery of an additional 293 units per annum on top of the already ambitious targets for the second half of the plan period.

1.42 It will be for the appointed Inspector to determine the SOUNDNESS of the approach adopted in relation to housing delivery.

1.43 To maximise the delivery of sites in the short term it remains incumbent on the Council to ensure that the site capacity of smaller sites is maximised in order to maximise supply in the early years of the plan.

1.44 Paragraph 4.143 of the HDTP recognises that “The Plan is heavily reliant on the delivery of larger strategic sites to meet OAN, the delivery of which are linked to the necessary improvements to the A3 (with the exception of North Street). For this reason, it is important that we consider smaller sites, such as those around villages, which are able to deliver in the early years to ensure that whilst much of our supply is backloaded, we are nevertheless making a concerted effort to boost the sustainable supply of housing in the early years.”

1.45 In addition paragraph 4.144 of the HDTP advises that the selection of sites in the short-term seeks to “…maintain the integrity of the Green Belt by limiting growth to those sites that are located in Green (low sensitivity land parcels) only.”

1.46 In the above context Our Client considers that the Plan should specifically emphasise that maximum use should be made of suitable sites within and adjoining villages as these sites will be more readily deliverable at an earlier stage in the plan period than the large strategic designations.

1.47 In focusing on the release of low sensitivity Green Belt land it is, however, vitally important that the most effective use is made of those sites when they are released and developed. Our Client considers that more effective use could be made of Site Allocation A45 (which is on a low sensitivity land parcel) and that a more realistic density would be circa 30 units. The boundaries of the site should also be increased to include the full site area of 0.95 Hectares (see attached Plan, Ref: A15517.01.01A).

UNSOUND: To ensure that the Council’s housing target is suitably robust and capable of reacting to change the AHT should be amended to include the projected backlog at the point of adoption. The Council’s figure of 11,129 additional units should form the basis of the total AHT supply. This will provide clarity and clearer guidance on housing supply and delivery.

The Council should also look to secure a greater contribution from inset villages and infill development within identified Green Belt villages. Specifically, the capacity of Site A45, Land to the rear of the Talbot, High Street, Ripley should be increased to approximately 30 units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

QUESTION 1: THE EVIDENCE BASE AND SUBMISSION DOCUMENTS

1.9 The Council have still not published an update on CIL.

1.10 This will be a key document in assessing and evaluating the deliverability of sites and other plan commitments, in particular the level of affordable housing sought from new development and the delivery of new infrastructure. The importance of infrastructure provision is highlighted by paragraph 2.10a which recognises that ‘Pressure on existing infrastructure and additional stress caused by planned growth must be addressed…’ However, in the absence of a joint consultation on CIL it is not possible to critically assess how and when infrastructure will be facilitated and the impact this could have on the delivery of new housing sites.

1.11 Our Client is particularly concerned that the currently proposed 40% target for affordable housing provision has been determined on the basis of assumptions from the Preliminary Draft of the CIL Charging Schedule, 2015.

1.12 Our Client would also continue to question the robustness of the Viability and Affordable Housing Study, Peter Brett Associates, December 2014 which was prepared in the context of a Draft affordable housing policy (now amended in the Proposed Submission Draft Local Plan) and which utilises the preliminary CIL figures.

1.13 It is imperative that the Council ensure that:

- The Evidence Base guidance is reflected in the policy approach adopted unless clear justification for departing from the Evidence base is provided;
- The Evidence Base relied upon is up to date;
- The Evidence Base is published at an early enough stage in the process and that stakeholders are afforded an opportunity to comment on it before key policy decisions are fixed locally. This is particular relevant in evaluating the viability of the affordable housing threshold in isolation from a draft CIL charging schedule.

UN SOUND: The absence of an up to date CIL charging schedule, taking account of responses to the 2015 and 2016 consultations, means that the Council cannot proceed with confidence that the 40% affordable housing target will be achievable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp17q/286  **Respondent:** 15733697 / Ripley Carriage Ltd (The Burr Family)  **Agent:** Shrimplin Brown (James Brown)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
QUESTION 2 AND 3: LEGAL COMPLIANCE AND SOUNDNESS

1.14 As a whole our Client considers that the Local Plan may be found to be legally compliant and sound subject to comments in relation to specific policies which for ease of reference we consider in turn below.

1.15 As a general point we are concerned that the Council have failed to “…assess the likely cumulative impacts on development in their area of all existing and proposed local standards…” (Paragraph 174 of the NPPF).

1.16 In particular our Client continues to have concerns regarding the cumulative impact of the following policies (as amended); Affordable Homes (Policy H2); Policy D1 (Shaping Places); Policy D2 (Sustainable Design, Construction and Energy) and the Council’s future proposals for CIL (only a preliminary charging schedule currently published). These issues have not been addressed in the changes.

1.17 The wider conformity with National guidance is considered individually below in our responses to individual policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base.

Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- [Highways England letter 18 July 2016 - Representation to consultation.pdf](#) (7.7 MB)
- [Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf](#) (1.2 MB)

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7755</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
</tr>
</tbody>
</table>

[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base.

Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- [Highways England letter 18 July 2016 - Representation to consultation.pdf](#) (7.7 MB)
- [Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf](#) (1.2 MB)

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7756</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
</tr>
</tbody>
</table>

[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base.

Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7757</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
</tr>
<tr>
<td>Respondent:</td>
<td>15746081 / Highways England (Patrick Blake)</td>
</tr>
<tr>
<td>Agent:</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base.

Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Highways England letter 18 July 2016 - Representation to consultation.pdf](7.7 MB)  [Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf](1.2 MB)

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/7758</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
</tr>
<tr>
<td>Respondent:</td>
<td>15746081 / Highways England (Patrick Blake)</td>
</tr>
<tr>
<td>Agent:</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base.

Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Highways England letter 18 July 2016 - Representation to consultation.pdf](7.7 MB)  [Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf](1.2 MB)
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7759</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base. Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents: <a href="#">Highways England letter 18 July 2016 - Representation to consultation.pdf</a> (7.7 MB)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf (1.2 MB)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7760</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base. Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents: <a href="#">Highways England letter 18 July 2016 - Representation to consultation.pdf</a> (7.7 MB)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf (1.2 MB)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17196</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base. Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents: <a href="#">Highways England letter 18 July 2016 - Representation to consultation.pdf</a> (7.7 MB)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf (1.2 MB)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID:</td>
<td>PSLP16/17195</td>
<td>Respondent:</td>
</tr>
<tr>
<td>-------------</td>
<td>--------------</td>
<td>-------------</td>
</tr>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base.]

Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Highways England letter 18 July 2016 - Representation to consultation.pdf (7.7 MB)  
- Highways England letter 5 October 2016 - Further comments following clarification meeting with GBC.pdf (1.2 MB)

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/5435</th>
<th>Respondent:</th>
<th>15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[Highways England made a formal representation on 18 July 2016. See the first attachment for this representation including comments on this element of the consultation documents and/or associated evidence base.]

Highways England made further comments on 5 October 2016 following a clarification meeting with Guildford Borough Council. See the second attachment for this letter.]
POLICY A25: GOSDEN HILL

APPENDIX C INFRASTRUCTURE SCHEDULE

Highways England notes the proposed reduction in the number of dwellings and employment space to be delivered during the plan period. The removal of the definition of the size of the Park and Ride site from Policy A25 is also noted.

We support the proposed changes to the policy. We particularly note the transport package to facilitate growth at the site which includes having regard to the forthcoming Sustainable Movement Corridor Supplementary Planning Document which alongside other measures has the potential to reduce impacts on the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5436  Respondent: 15746081 / Highways England (Patrick Blake)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A26: BLACKWELL FARM, HOGS BACK

Highways England notes the proposed reduction in the number of dwellings to be delivered during the plan period.

Highways England also notes that it is proposed that a through vehicular link between the A31 Farnham Road and Egerton Road will now be controlled to provide a new route for employees, residents and emergency services. It is noted that this is now said to “reduce impact on the A31/A3 junction, in advance of the delivery of Highways England’s A3 Guildford scheme”. We are keen to work with GBC and/or the site promoter to understand the degree of impact reduction on the A31/A3 junction ahead of a potential A3 scheme. Further it is unclear at this stage what level of growth can be delivered in advance of a potential A3 improvement and the consequences for growth at the site if there is no A3 improvement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5437  Respondent: 15746081 / Highways England (Patrick Blake)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The requirements section of Policy A35 newly proposes that additional mitigation is required for the Wisley Airfield development in the form of “two new slip roads at A247 Clandon Road (Burnt Common)”. The Transport Topic Paper paragraph 5.56 notes that the new slip roads are being promoted to “mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley Airfield site (site allocation Policy A35)”.

As noted in our letter dated 5 October 2016, it remains unclear if these slip road proposals are deliverable and what the conditional requirements are to enable the proposals to progress. It is not clear if proposals set out in Policy A43 (and now additionally Policy A58 and A35) are dependent on GBC’s aspirations set out in A43a. Appendix C Infrastructure Schedule notes that the Burnt Common slip road scheme will be wholly developer funded. To date we do not have any evidence that such an improvement is deliverable and could be designed in conformity with the Design Manual for Roads and Bridges.

We would welcome further discussions on these policies.

We understand that the Wisley Airfield site is expected to go to Planning Appeal in September 2017 which will likely have implications for the soundness of these policies, therefore discussions are urgent if proposals are reliant upon the improvement set out in A43A that is being promoted by GBC and Surrey County Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5438  Respondent: 15746081 / Highways England (Patrick Blake)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A46: LAND TO THE SOUTH OF NORMANDY AND NORTH OF FLEXFORD

Highways England notes this policy has been removed in the 2017 Local Plan and as such our comments on this Policy included within our letter dated 5 October 2016 are to be withdrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/3528</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY ID1: INFRASTRUCTURE AND DELIVERY**

It is noted that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. As set out in Policy ID1, it is essential that “the delivery of developments may need to be phased to reflect the delivery of infrastructure” and that “if the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused”. We consider this to be essential due to the existing congestion issues and the lack of certainty of any future scheme, as noted above.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3529</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY ID2: SUPPORTING THE DEPARTMENT FOR TRANSPORT'S “ROAD INVESTMENT STRATEGY”**

Our letter dated 5 October 2016 sets out Highways England comments on Policy ID2 and specifically its position on a potential A3 and planned M25 schemes, which remain the current position. However you will note that subsequent to a public consultation earlier this year, we plan to announce the preferred route for the M25 Junction 10 scheme in late August. This may or may not have implications for proposals set out in policies A43A (Burnt Common) and A35 (Wisley Airfield) can be delivered.

We are pleased to advise that on the 10th March 2017 the Department of Transport announced £220 million to help motorists to beat congestion and this included schemes for the A3 Guildford Northbound Off Slip at the University Interchange and A3 Guildford Stoke Interchange Southbound Off Slip Improvements. Further, we can also advise that schemes at Beechcroft Drive and for Safety Enforcement Cameras on the A3 through Guildford have been funded to enable progress with the intention to start construction before 2020.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: pslp171/3530 | Respondent: 15746081 / Highways England (Patrick Blake) | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY ID3: SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS

Highways England is supportive of the changes to Policy ID3, which are required to help maintain the safe operation and performance of the SRN.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3526  Respondent: 15746081 / Highways England (Patrick Blake)  Agent:

Thank you for consulting Highways England in relation to the Guildford Borough Council (GBC) targeted Proposed Submission Local Plan (Reg 19).

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In this case Highways England’s interests relate to the potential impact of development on the A3 and M25.

Overall, in accordance with national policy, we look to GBC to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN because of planned growth within the Guildford borough, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the A3 and M25.

This correspondence follows on from our letters dated 18 July and 5 October 2016, produced in response to the 2016 Proposed Submission Local Plan consultation for which our comments remain (with the exception of Policy A46 which has subsequently been removed from the 2017 Proposed Submission Local Plan).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3527</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY S2: PLANNING FOR THE BOROUGH - OUR SPATIAL DEVELOPMENT STRATEGY**

**TOPIC PAPER: TRANSPORT APPENDIX 3 (2017)**

**LAND AVAILABILITY ASSESSMENT ADDENDUM (2017)**

It is noted that the Annual Housing Target numbers presented in Policy S2 differ to those presented in the Topic Paper: Transport Appendix 3 (2017) and the Land Availability Assessment Addendum (2017). It would be helpful if this could be clarified.

The housing trajectory contained in the Land Availability Assessment Addendum demonstrates that many thousands of houses are expected to be delivered after the next roads period (2020-2025). Some of these Local Plan sites may be wholly or partially reliant on a potential improvement on the A3 through Guildford. It would be helpful to understand in more detail which development sites are expected to come forward ahead of a potential scheme and which development sites may be dependent upon it.

Owing to the existing A3 congestion issues and the lack of certainty for any potential future scheme on the A3 through Guildford, the management and phasing of the Local Plan developments will be critical.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/686</th>
<th>Respondent: 15746081 / Highways England (Patrick Blake)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is recognised that the transport evidence base (SHAR 2016) has not been updated, with no further transport modelling taking place.

The Addendum document notes that “key changes made to proposed site policies and to the programme of transport schemes in the Draft Local Plan, as identified in the Draft Local Plan 2017, are not considered likely to change the conclusions of the SHAR 2016”. The SHAR 2016 concludes that: “the results of this assessment indicate that should the RIS schemes not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe”.

As noted above, it would be helpful to understand in more detail which developments are expected to come forward ahead of a potential A3 improvement scheme and which developments may be dependent upon a scheme. The management and phasing of the Local Plan developments will be critical to maintain the safe operation and performance of the SRN.

TRANSPORT TOPIC PAPER JUNE 2017

1. Evidence Base


With regard to the Addendum Strategic Highway Assessment Report it is noted that “GBC, with Surrey County Council, we will be undertaking new supplementary technical work prior to the submission of the plan to the Secretary of State. This will respond to the remaining issues raised by Highways England on the strategic highway assessment”.

Highways England looks forward to working with GBC and Surrey County Council to take forward the supplementary technical work. This would likely include outputs from the forthcoming update to Surrey SINTRAM model and be used to inform updates to the Infrastructure Delivery Plan supporting the Local Plan. Further the supplementary technical work could help inform a Statement of Common Ground or similar between Highways England, Surrey County Council and GBC.

1. Appraisal and Local Plan

GBC has included Policy ID2 ‘Supporting the Department for Transport’s Road Investment Strategy’ within the Local Plan and text within the Transport Topic Paper between paragraphs 5.33 and 5.57. With regard to the current status of the RIS schemes see our comments on Policy ID2 above.

Paragraph 5.89 notes that “in the early years of the new Local Plan, the delivery of planned development and the impact of new development traffic on the SRN is likely to be an important ongoing consideration as the existing SRN suffers from significant congestion during peak periods. Highways England’s main concern is road safety and any proposal that adds significant levels of traffic to existing congested areas will need to be carefully assessed through the development management process for planning applications to ensure that it does not have a severe impact on road safety”.

Paragraph 5.90 notes that “the delivery of planned development has been proposed to ensure that the sites, and phasing of sites, that will be delivered in the first years of the new Local Plan, and therefore in the absence of the Department for Transport’s RIS Road Period 1 and/or Road Period 2 schemes are located where traffic associated with them will have the least impact on the SRN’s links and junctions where current congestion issues are the most acute”.

As noted above, it would be helpful to understand in detail which developments are expected to come forward ahead of a potential A3 scheme and which sites are dependent upon a scheme. This is required to allow critical management and phasing of the Local Plan developments to take place.

SUSTAINABILITY APPRAISAL

Highways England has no comments on the Sustainability Appraisal, as the broad transport conclusions remain unchanged.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16002</th>
<th>Respondent:</th>
<th>15789441 / Education Funding Agency (Samantha Powell)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Thank you for seeking the Education Funding Agency’s (EFA) views on the above document; we welcome the opportunity to contribute to the development of planning policy at the local level.

2. The EFA was established in 2012 in order to help the government achieve its schools objectives by delivering effective capital programmes that improve the condition of existing buildings and support the creation of new places for pupils and learners. We manage £54 billion of funding a year to support all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.

3. The EFA aims to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. As such, we would like to offer the following comments in response to the proposals outlined in the above consultation document:

   **Infrastructure Policies (Policy I1)**

   1. The EFA support reference within Policy I1 to securing contributions from developers towards school provision through CIL and s106. You will have no doubt taken account of the key strategic policies to reiterate this position, but it would be helpful if they were explicitly referenced within the document. In particular:

   National

   1. The *National Planning Policy Framework* (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72).

   2. The EFA support the principle of Guildford Borough Council (BC) safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. Support is also given for the siting of schools within the allocated sites in locations which promote sustainable travel modes for pupils, staff and visitors. There is also a need to ensure that the education contributions made by developers are sufficient to cover the increase in demand for school places that is likely to be generated by a development. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.

   3. Guildford BC should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on *Planning for Schools Development* (2011)
which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system.

**Guildford BC Proposed Policy and Provision**

1. The EFA welcomes the support in Guildford’s Infrastructure Delivery Schedule (para 4.6.3) to schools as necessary infrastructure required to help deliver sustainable growth in the borough. The EFA note that significant growth in housing stock is expected in the borough, with 14,500 new homes anticipated between 2017-2033. This will place significant pressure on social infrastructure such as education facilities.

2. In light of the above, the EFA encourages local authorities to work closely with us during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places.

3. In this respect, the EFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD). The DPD provides policy direction and establishes the Council’s approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including on MOL), whether by extension to existing schools or on new sites. The DPD includes site allocations and policies to safeguard the sites, and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to securing site allocations for schools in your emerging sites allocations document, as well as providing example policies to aid their delivery within your subsequent Development Management DPD.

4. The Guildford Draft Local Plan: Education Review (May 2016) provides a useful background document setting out Guildford’s requirements for new schools over the plan period. It confirms the need for 8FE primary places across the borough arising specifically from the strategic sites identified. In addition, it confirms 5FE secondary provision is required (beyond the existing planned provision) up to 2025. We note the Education Review is however intended to be reviewed and updated prior to the Strategy and Sites examination and request sight of this once published, to help inform any subsequent response from the EFA. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Guildford can swiftly and flexibly respond to existing and future need for school places to meet the needs of the borough over the plan period.

5. The EFA’s comments on the identified sites for anticipated education provision over the plan period are set out in the table below. These include strategic sites and sites identified in Guildford’s Infrastructure Delivery Schedule:

<table>
<thead>
<tr>
<th>Location / (Strategic) Site allocation name /reference and approx. number of new homes.</th>
<th>Proposed FE (Primary and secondary)</th>
<th>Infrastructure Delivery Schedule (IDS) reference / and delivery date</th>
<th>EFA Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Merrow / A25 Gosden Hill Farm, c2000 homes</td>
<td>2FE primary Up to 4/ (4-6FE in IDS?) secondary (the need for 2FE of this arising from the development) / or a through school (TBC) on site large enough for 7FE</td>
<td>PED3 / Years 1-15 SED1 / TBC</td>
<td>Note the 2FE primary is to be funded by the development (serviced land and build costs) and the 4FE secondary part-funded (c50%) by the development. 4FE secondary - developer to provide serviced land and transfer it to SCC. Developer contributions (from other sites) to fund build.</td>
</tr>
</tbody>
</table>
Support – this is an area where basic need will arise from the housing development proposed. The
EFA would welcome the opportunity to work closely with Guildford BC to investigate the feasibility of opening a free school(s) on this site.

<table>
<thead>
<tr>
<th>Location</th>
<th>School Details</th>
<th>PED / Years</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ockham / A35 land at former Wisley airfield</td>
<td>2FE primary 4FE secondary</td>
<td>PED2 / Years 1-15</td>
<td>Note the 2FE primary is to be funded by the development (serviced land and build costs) 4FE secondary part-funded (c50%) by the development. (Developer to provide serviced land at nil cost. Build costs from developer contributions)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SED2 / TBC</td>
<td></td>
</tr>
<tr>
<td>Slyfield / c1,000 homes</td>
<td>1FE primary on site or cash contribution</td>
<td>PED5 / Years 1-15</td>
<td>Note to be funded by the development (serviced land and build costs or a cash contribution for off-site provision)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Blackwell Farm / c1,950 homes</td>
<td>2FE primary to serve this devt</td>
<td>PED4 / Years 1-15</td>
<td>Note to be funded by the development (serviced land and build costs)</td>
</tr>
</tbody>
</table>

Note that above two (Gosden Hill and Wisley) secondary schools could be run together or separately, depending on phasing and providers.
<table>
<thead>
<tr>
<th>Location</th>
<th>Details</th>
<th>Code</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Normandy/Flexford</strong></td>
<td>Up to 7-8FE secondary (FE TBC at time of planning application) 1FE to serve this development, remaining capacity to serve Blackwell Farm Strategic site (1,950 homes) and wider area inc Ash (1,326 homes) Primary – if needed</td>
<td>SED3 / TBC</td>
<td>Note developer to provide erviced land at nil cost, build costs from developer contributions</td>
</tr>
<tr>
<td><strong>A46 Land to the south of Normandy and north of Flexford</strong></td>
<td>(Potential) 1-2FE primary expansion of Ash Grange primary (if required to meet needs of homes south and east of Ash and Tongham)</td>
<td>PED6 / Years 0-5</td>
<td>Funded by developer contributions</td>
</tr>
<tr>
<td><strong>Ash / 1,326 homes</strong></td>
<td>(Potential) 1-2FE primary expansion of Ash Grange primary (if required to meet needs of homes south and east of Ash and Tongham)</td>
<td>PED6 / Years 0-5</td>
<td>Funded by developer contributions</td>
</tr>
<tr>
<td><strong>Other</strong></td>
<td>Wyke Green 1FE primary expansion (of existing community/ maintained school) to serve strategic site A46 Normandy / Flexford</td>
<td>PED1 / Years 1-15</td>
<td>Funded by developer contributions</td>
</tr>
<tr>
<td><strong>Guildford town</strong></td>
<td>Up to an additional 3FE in Guildford Town; SurreyCC currently in discussions with existing schools</td>
<td>PED7 / Years 1-5</td>
<td>Funded by developer contributions</td>
</tr>
<tr>
<td><strong>Kings College School grounds, Park Barn.</strong></td>
<td>University Technical College (UTC)</td>
<td>SED4 / Sept 2018</td>
<td>£10m EFA funding approved May 2015.</td>
</tr>
</tbody>
</table>

**Access / Transport Issues**

1. In developing policies for new schools, consideration should be given at an early stage in the site appraisal process as to how the use of public transport, cycling and walking can be encouraged to help reduce the number of car journeys to and from new schools. The inclusion of a well-developed green travel plan can help to ensure that new schools are better integrated with existing communities.

**Developer Contributions, costs of school provision, CIL and EFA funding**

1. There is a need to ensure that education contributions made by developers are sufficient to cover the increase in demand for school places that are likely to be generated by major developments in the borough. The EFA
acknowledge the pupil yield calculator Surrey currently use to seek s106 contributions and support this approach in principle.

2. We note Guildford BC are currently preparing their CIL charging schedule and support the inclusion on the draft Regulation 123 list of primary school provision on strategic sites allocated in the Local Plan. The EFA would be particularly interested in responding to any review of infrastructure requirements, CIL draft charging schedule and (once adopted) any subsequent CIL review and/or amendments to your Regulation 123 list. As such, please add me to your database as the EFA contact for Local Plan and CIL consultations.

3. EFA have recently held discussions with officers from Guildford BC and Surrey CC regarding the potential for EFA to forward fund the provision of schools. We look forward to progressing these discussions with your officers for those sites/schools which will be secured by 2020.

4. Finally, I hope the above comments are helpful in shaping Guildford’s Local Plan Strategy and Sites, with particular regard the provision of land for new schools. I look forward to opportunities for EFA’s continued involvement in the Local Plan process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/4290  Respondent: 15804961 / Pegasus Life  Agent: Barton Willmore (Huw Edwards)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Draft Policy A1: The Plaza, Portsmouth Road, Guildford

Pegasuslife is the landowner of the Site identified in draft Policy A1, with the extent of the Site identified on the plan accompanying the draft Policy. The previous version of draft Policy A allocated the Site for 70 homes within the C3 Use Class.

The Site has been the subject of significant pre-application discussions with your Officers for proposed development to provide assisted living accommodation for older people with communal facilities and health and wellbeing facilities. GBC concluded that the proposed development is a Sui Generis Use Class in September 2015.

A planning application was subsequently submitted to GBC in April 2016 on behalf of Pegasuslife for assisted living accommodation, which was withdrawn. Following further discussions with GBC, a revised application was submitted in March 2017 on behalf of Pegasuslife, which is currently subject to determination, for the provision of:

Proposed assisted living accommodation for older people (sui generis) comprising communal facilities including residents lounge, guest suite, health and well-being facilities, cafe/restaurant, staff offices, basement car parking, cycle parking, bin storage, plant room, associated hard and soft landscaping, and groundworks.

Our previous submissions on behalf of Pegasuslife to the June 2016 Proposed Submission Local Plan supported the principle of draft Policy A1, which confirms the acceptability for redevelopment at the Site for residential purposes. However, we objected to the sole allocation of the Site for residential use (Use Class C3) and considered the Site should instead be allocated for residential (Use Class C3) and/or assisted living accommodation for older people (C2/Sui Generis).
We also submitted that the Site should be allocated for approximately 90-100 dwellings. Draft Policy AI has been amended within the current focused consultation, allocating the Site for approximately 90 homes within the C3 Use Class or accommodation for older people within the C2 Use Class.

Whilst PegasusLife continue to support the principle of draft Policy AI and the increase in the number of homes allocated, PegasusLife remain concerned that the draft Policy does not reflect the currently submitted application for assisted living accommodation falling within the Sui Generis Use Class.

Assisted living accommodation for older people is considered to be an entirely appropriate land use given the Site's location within the Town Centre. The Site has good levels of accessibility via walking, cycling and public transport modes. Both Guildford Railway Station and Guildford Bus Station are within an 8-minute walk from the Site.

The number of older people in the UK is growing and the HAPPI 3 Report1 (June 2016) states that the number of people aged 80 and above will more than double by 2037 and the number of people aged over 90 will triple. The number of centenarians (i.e. those older than 100 years old) shows an increase of sevenfold in estimates from 14,450 in mid-2014 to 111,000 in mid-2037.

In the light of the rate of change, it is not surprising that there is a chronic undersupply of suitable housing for older people in the UK with retirement properties making up just 2% of the housing stock (approximately 533,000 homes). To put this into perspective, the over 65 population is approximately 10 million and the over 60 population is approximately 14 million. Evidently, the demand for suitable housing for older people significantly outweighs the supply.

The ONS Annual mid-year population estimates (2014) for the UK (published in June 2015), estimates a rise in the medium age of the population to 40-years (the highest ever estimated) as the number and therefore proportion of older people continue to rise, up 0.3% in a year. This only reinforces the need for a response to the crisis.

Accordingly, the NPPF (Paragraph 50) encourages a wide choice of quality homes that widen opportunities for home ownership and create sustainable, inclusive and mixed communities. LPAs are required to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, including older people and people with disabilities. The revisions to the Planning Practice Guidance (PPG) (March 2015) strengthen the requirement for LPAs to plan and provide housing for older people.

Paragraph 4.2.7 of the Pre-Submission Local Plan confirms that self-contained accommodation for the elderly will contribute to GBC's local housing requirement. The sustainable location of the Site therefore makes it appropriate for this land use to make an important contribution to local housing need.

Furthermore, GBC has confirmed the suitability of the Site to provide accommodation for older people within draft Policy AI through the amendment of the Policy. However, this unduly restricts developments within the C2 Use Class, contrary to the currently submitted planning application and does not provide any flexibility or consideration that accommodation for older people falling within the Sui Generis Use Class would similarly be acceptable.

It is important to note that PegasusLife consider that assisted living accommodation could be classed as C2 or Sui Generis; it is GBC who has determined that the proposals for the Site fall within the Sui Generis Use Class. It is therefore inconsistent of GBC not to reflect this position in the draft allocation for the Site.

We consider that the Site can accommodate approximately 90-100 dwellings, which is in line with PegasusLife's proposed response to consultation feedback received for the proposed development. It is considered appropriate that a dwelling range is provided in order to be flexible and respond to prevailing circumstances. Whilst we support the increase from the previously allocated 70 dwellings, it is submitted that a range of between 90 and 100 would be more appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2615  Respondent: 15804961 / Pegasus Life  Agent: Barton Willmore (Huw Edwards)
### Draft Policy H2: Affordable Homes

Draft Policy H2 requires that on sites providing five or more homes, or sites of 0.17ha or more, that at least 40% are to be affordable. The 'reasoned justification' for this draft policy previously stated at Paragraph 4.2.35 of the June 2016 Pre-Submission Local Plan:

This policy applies to all new homes within the C3 Use Class. This generally includes retirement homes, as well as self-contained studio flats for a single household, whether specifically aimed at students or not. It does not apply to residential institutions such as care homes and nursing homes. Assisted living and other sui generis residential developments may be required to make provision; these will be considered on a case-by-case basis.

Within our representations to the June 2016 Pre-Submission Local Plan we objected to this Policy. We noted that the last aspect of Paragraph 4.2.35 has been amended in the updated document to state:

Assisted living, extra care and other C2 residential developments may be required to make provision; these will be considered on a case-by-case basis.

Whilst we support the removal of Sui Generis developments from the Policy, our objection to this draft Policy remains since it still applies to assisted living accommodation. Thereby the policy does not take into account the viability or provide certainty for emerging models of accommodation and care for older people. The draft Policy is therefore not considered 'effective' in this regard, and therefore fails this test of 'soundness'.

Assisted living accommodation for older people generates additional costs relative to residential development (Use Class C3) due to the need for specialist design and specification, the sacrifice of saleable area for the provision of services and facilities with no compensating income, and other differentiating factors. Land must be competed for on the open market with key competition including non-specialist housebuilders, student housing developers and commercial developers. Inevitably, in reaching a competitive land value an affordable housing provision equal to that assumed by non standard housebuilders bidding on the site cannot therefore be sustained.

This is a structural issue which affects the delivery of assisted living accommodation for older people at a strategic level. Not seeking to achieve parity of affordable housing provision between specialist and mainstream developments is essential to supporting efforts to boost the supply of housing in this sector in line with both national and local priorities. Owing to the further increased costs of redevelopment on previously developed sites, it is therefore considered that Policy H2 should not apply to assisted living developments on previously developed land.

Furthermore, draft Policy H2 does not currently provide any certainty for developers delivering assisted living, extra care and other C2 residential developments. Draft Policy H2 currently states such schemes 'may be required' to make an affordable housing provision, which will be considered on a case-by-case basis. As such there is no certainty as to whether GBC will seek an affordable housing contribution, which is likely to result in every developer wishing to provide such housing having to undertake a viability appraisal and negotiate accordingly with GBC, adding unnecessary expense and time delays to schemes providing much needed forms of housing.

Draft Policy H2 is somewhat contradictory within the reasoned justification, stating at Paragraph 4.2.35 that it does not apply to residential institutions such as care homes or nursing homes, then in the next sentence stating assisted living, extra care and other C2 developments may be required to make provision. Given that the majority of care homes or nursing homes will fall within Use Class C2, there is no clarity as to whether Policy H2 applies or not in these instances.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/369  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The earliest dates for the railway stations at Park Barn and Merrow are not expected before 2024 (six years later than first anticipated).

Two road safety schemes for the A3 have been abandoned.

SCC appear to have washed their hands of involvement in the delivery of a number of highway developments on the local road network (which is their responsibility). (E.g. those in LRN7).

LRN7 (For Wisley Airfield) is an example of inadequate infrastructure requirements to address the problems that would be created by a strategic site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/367  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GGGG objects to the continued poor quality of the evidence base and lack of sound property market research that relates to the local market in Guildford rather than the continued reliance on generic economic capacity forecasts. As a result many of the submission documents providing key evidence are unsound, unreliable and inconsistent.

Key parts of the evidence base are flawed or based on withheld assumptions.

The latest SHMA 2017 still inflates the proposed housing figure due to the following factors:
An independent review by NMSS of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357 sq m of B1c, B2 or B8 use class is a quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

The ELNA states “that a large proportion of the net additional floorspace and land requirements for both office/R&D and industrial/storage uses could be met through the permissions which have been consented but which have yet to be implemented. However, there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

“There is the possibility that some pipeline developments may not come forward” is patently a weak argument indeed for the proposed industrial development at Burnt Common in the Green Belt and expansion of the Surrey Research Park into the Green Belt which has unused consents dating back many years and also the substantial latent potential for an increased density of development. The current plot ratio is less than 25%. The reason that the unused consents have not been used up is simple. There is a proven lack of demand.

Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the “clicks and mortar” conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/370</th>
<th>Respondent:</th>
<th>15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to the changes to Policies A36 to A41 (East and West Horsley) The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance. The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.

No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend. The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents.

The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops.

These were fully set out in responses to last year’s public consultation. The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements. Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2754  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to the changed policy A25 Gosden Hill for the development of 1700 homes. Deferral of the target number of homes by 300, to be built after the plan period, is effectively just a smoke and mirrors exercise. This housing is still being allocated. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Ripley through to Guildford. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below). The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2757  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the changed policy A26 Blackwell Farm for 1500 homes which is still far too much. As for Gosden Hill, the deferral is not a genuine reduction but merely a presentational exercise.

There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly. The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road). An independent traffic study commissioned by the Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington will see a surge in traffic numbers as Guildfordbound drivers seek out the fastest route and divert along the B3000, B3100 or Down Lane.
Levels of nitrous oxide that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the last 2 years (GBC Air Quality Annual Status Report, September 2016. Compton Parish Council is expecting that this section of the B3000 will be made an Air Quality Management Area soon. Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

The development will result in the loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension the research park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The development site includes high-grade farmland and forms 20% of Compton’s green belt.

The development will produce more congestion at the Hospital/Tesco roundabout - This will impede access to the Hospital's A&E unit - a problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceed (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.

The new road proposed would be inadequate for the volume of traffic, and once the development has been built out it wouldn’t be long before new roads were required to serve the new population, which would inevitably pass through Wood Street Village (adding to the congestion in Worplesdon and potentially ruining Wood Street Village Green) and/or through Flexford/Wanborough, potentially ruining the conservation area of Wanborough, with its 13th century church and 14th century barns. The development will result in more flooding. The Hog’s Back acts as a soak away for surface rainwater. Once its slopes are concreted over, this water will travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (a European protected habitat)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2758  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the changed Policy A35 Wisley in respect of the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management. This will not in any way mitigate the impact on Ripley High Street since traffic will need to pass through Ripley to reach Wisley. Previous objections therefore still stand for this changed policy concerning the reinclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents
are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to
the developers, a shadowy Cayman Islands company.

Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee,
including:

1. Green Belt location and absence of “exceptional circumstances”.

2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefor
within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and
fauna and has never had any buildings on it.

3. Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).


5. Absence of adequate traffic data.

6. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at
the proposed secondary school.

7. Loss of high-quality agricultural land (55% of the site), in breach of national policy.

8. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.


10. Cost of infrastructure required to the detriment of alternative more favourable sites.

11. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway
stations which have no spare parking capacity.


13. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.


15. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley
combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.

16. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley
above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under
water during the winter of 2013/14).

17. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2759</th>
<th>Respondent:</th>
<th>15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )
We object to the changed policy A42 Clockbarn Nursery to 60 homes.
It ignores all the hundreds of previous objections made by local people
The increase to 60 homes in place of 45 homes is 33% more and too much.
It will worsen access and traffic problems in Tannery Lane and at the A247 junction.
It will make erosion of Green Belt worse
It will make surface water flooding, which is already bad, even worse
It will impact open countryside views from the River Wey Navigation
The site is part of the permanent Green Belt at Send and should remain undeveloped inorder to preserve the amenity of the surrounding area.
The site has very restricted access along Tannery Lane which is narrow and for most of its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical.
Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic.
Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.
The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2760  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
It ignores all the thousands of previous objections made by local people
There is no proven demand for travelling show people plots in this location
There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan.

Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

We object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached.

We object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay.

Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

We object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

We object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

We object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

We object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

We object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified a Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

We object to poor air quality (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

We object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to the change by way of deletion of paragraph 4.5.8: “We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design…. There is no reasoned justification for this deletion and its omission will not make places better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to the change in Policy E1 sustainable employment because they have not addressed many of the 32,000 objections made to the 2016 plan.

We object to the inclusion of Send Business Centre/Tannery Studios Tannery Lane, Send in relation to proposed inset from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside
- It is adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

We object to the change in Policy E1 of proposed designation of Burnt Common as an Industrial Strategic Employment Site.

- It was deleted from the 2014 draft because of all the local objections made previously and there is no logical reason to go back on this decision
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land as shown in the Employment Land Needs Assessment 2017
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have many empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to a low of 3.7 and a high of 4.1 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the Green Belt
- There are patently no exceptional circumstances in terms of demand for employment space to build on this important area of Green Belt which effectively separates existing development in Send and Ripley and prevents urban sprawl
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

We also object to the potential inclusion at Burnt Common of a waste management facility mentioned at the change to paragraph 4.423a which lacks sufficient detail for proper consultation and is completely inappropriate. We object to the ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017.
which generally is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

We object to the fact that no reliable analysis has yet been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area.

GBC in their role as a Planning Authority appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of procurement of useful property market research analysis or forward planning.

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.” 38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm. Little regard is still not given to the opportunity of specific B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So i should target high added value small and medium sized enterprises rather than the headquarters of larger corporations. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>psp171/1247</th>
<th>Respondent:</th>
<th>15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy E2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites.

- This fails to provide sufficient public consultation in relation to access and traffic flows
- This fails to provide sufficient public consultation in relation to unpleasant aspects of waste management

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1248 **Respondent:** 15805601 / Guildford Greenbelt Group (Sir or madam) **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the changes in relation to Policy E3 maintaining employment capacity which do not take account of my previous objections to this policy

We object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1249 **Respondent:** 15805601 / Guildford Greenbelt Group (Sir or madam) **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to changes in policy E4 Surrey Research Park which is still earmarked for excessive expansion which is not supported by the findings of the Employment Land Needs Assessment 2017

We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. We object however to the completely unnecessary expansion of the Research Park into a larger Business Park. We object to the extension to the Research Park of over 10 hectares will be delivered. This I understand will provide a total capacity of around 35,000 sq m
of additional floorspace, of which 30,000 sq m is expected to be delivered in the plan period. This expansion is not effectively supported by evidence for an increase in B1b use class under the Employment Land Needs Assessment 2017.

We also believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We also object to the inclusion of B1c light industrial uses which is inappropriate and unnecessary. Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user Research parks that lose their way stop being the location of choice for new innovative enterprises. The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super manufacturing Monitoring indicators should include new start-ups and new patents created.

Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments The Surrey Research Park currently extends to 65,000 sq m The research park is developed at a plot ratio of 25%. This could be increased to 50% within the same footprint of the existing park without damage to its amenity. The actual current land use for development in the park is in fact only 12.5% because most buildings are 2-storey.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/1252  **Respondent:** 15805601 / Guildford Greenbelt Group (Sir or madam) **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

We object to the changes in Policy E7 Guildford Town Centre

We consider that policy E7 is still very ill-informed and there is insufficient evidencia support to objectively assess the capacity of the existing town centre to accommodate appropriate new development and therefore fails the requirements of Section 161 of the NPPF to assess the real quantitative and qualitative floor space needs. Policy E7 is still an aspirational voice from the past and is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre needs or can be expanded by 41,000 sq m of retail space at North Street because of lack of demand for retail units in the Town Centre particularly large units. This is due to falling demand for retail space in Guildford and town centres throughout the country evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping.

The recent Carter Jonas Study Retail Study 2017 update predicts total demand for Guildford Town Centre by 2020 at only 3,313 sq m and only 34,811 sq m by 2036. We have now been waiting some 15 years + for demand to catch up to enable development of North Street where the old consent for some 40,000 sq m of retail had to be renewed because it was getting out of date. Are we now going to have to wait till 2036 only another 19 years for demand to get to the point to enable
development of this much prized site which developers have not exactly been falling over themselves to develop. That is also assuming that all retail demand in the Town Centre is wanting just this site. However optimistically and quite illogically they protest that “there still remains significant capacity to support new comparison goods floorspace over the plan period”. It’s a bit like saying in town x we have currently 100,000 m of shopping and the UK retail forecast done by Experian shows that we can predict a growth of 10% therefore this means we must have an additional 10,000 sq m in town x. This is unscientific guess work.

In table 2 Appendix 6 of their report we learn that there is a potential for turnover to reach £856.3m in the town centre by 2020 however actual committed floorspace take up accounts for only £1.3m of this. This is 0.15%. It is hardly surprising that there are no details of take up or real demand evidence given anywhere in the report. The Carter Jonas report is based on broad brush retail capacity forecasting derived from work by Experian which is very far from site or location specific and as a retail supply and demand assessment in my view is totally unreliable. The source is not even Guildford specific or even Surrey specific. The authors of the report do not disagree with my cynicism with capacity forecasting since they state up front that “It should be noted at the outset that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution” and repeated again “at the outset we advise that all capacity forecasts beyond a five year period should be treated with caution. This is because long term trends in the economy, consumer demand and retail property market could have a significant impact on the potential capacity and need for new retail floorspace. For example, as discussed previously, a higher growth in nonstore retail sales (i.e. Internet sales) than forecast by Experian would reduce the capacity for new retail floorspace over time.” The Carter Jonas report is a vague whitewash report for a pre-conceived and outdated concept of increased retail development in the town centre. “For comparison goods, we have assumed the same estimations for convenience goods expenditure ‘inflow’ (10%) for Guildford Town Centre, again based on the centre’s role as a popular shopping and visitor destination.” Coming to the vague conclusion that Guildford is popular is far from reliable property market research.

The closest thing I can find to evidence of actual demand in this report is to read “In addition to focusing their attention on larger, dominant centres, many of the multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology.” But this statement applies to any of 100 centres in the UK. We are concerned as to whether the authors of this retail study have actually visited Guildford or know where it is? In their 2014/2015 reports Carter Jonas provided a fairly inaccurate picture of retail demand (originally Appendix 6) with the inclusion of retailers who had either gone bust or actually specified demand requirements in centres other than Guildford. This I note has now been deleted presumably because of its inaccuracies which were dealt with in my 2016 objection and has not been updated. We are now left with no demand assessment from either small, medium sized or large retailers. This does not support the view that Guildford is a vibrant retail destination requiring expansion with a large retail development in North Street.

The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions. What Guildford needs is a new focus on specialty high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and a new major visitor attraction supported by restaurants. Guildford needs to become the quality shopping destination for Surrey. The existing site in North Street should be replaced with a well-designed ground floor high quality specialty retail mall and frontage of no more than 40 shops extending to 10,000 sq m with the rear and upper floors providing an additional 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tunsgate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years. We also object to the continued failure of this policy to provide much needed substantial residential development in the Town Centre which is still only a modest target of 1,300 homes. Only approximately 10% of the total planned for the Borough.

There is still a blind overconcentration on retail expansion which fails to take account of market forces and a complete failure to grasp the reality that a residential expansion is required to stimulate retail/leisure demand in the Town Centre which is markedly losing out to nearby centres such as Woking which has a very different approach. See them Town Centre Opportunity in next section. We object to the deletion of the vision statement “Guildford town centre has a unique setting and historical character, and is at the centre of one of the most prosperous counties in England. We will protect and build on these assets and insist that all new development will be of the highest design and environmental standards. We will be proactive in building a great town centre which connects to the amenity of the riverside. We will invest in creating high
quality public realm. We will put people above traffic and we will promote new high quality retail and business
development. To achieve this we will develop innovative funding and delivery bodies. As we embark together towards this
exciting future we pledge that we will continue and extend an active dialogue with our residents and other stakeholders."

Guildford Town Centre needs a decent vision. Without a vision the Town Centre is flying blind and it demonstrates the
failure of the potential for imaginative Town development in this latest draft plan.

We support the deletion of paragraph 4.4.86 since many of the sites along the River Wey are capable of full development

We object to the deletion of the Allies and Morrison Masterplan as a source document for the plan since although it failed
to fully exploit the development potential of the Town Centre it did include many good ideas including more extensive
brownfield development extending to 2,551 homes including Woodbridge Meadows as a residential development site.

We do not consider that the modest target of 1,300 homes in the town centre takes account of the need and demand for
housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town
which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of
urban regeneration is much more residential development. As can be seen from the previous section, retail will not work!

The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an
absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015
which was originally adopted by GBC. The reality is that the Town Centre and other areas of brownfield in the borough has
the capacity for at least 5,000/7,500 homes.

The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity
for 7,500 homes:
- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1,000 homes on current GBC car parks (25 acres) and at the station
- 1,000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car
  parks)
- 1,000 homes at Slyfield on the 40 ha regeneration site
- 1,000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can
accommodate our local housing, economic and environmental needs. But first we must make 100% use of our urban
brownfield in the town before we consider building in the Green Belt or countryside. Paragraph 80 of the NPPF clearly
states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land
and other urban land”. In order to comply with central planning policy we need a brownfield strategy that states clearly
“We are committed to a brownfield first initiative” whereby all applications on previously developed land are given fast
track priority and every facility to promote development for residential purposes and employment purposes in order to
satisfy the needs of local people. In parallel a zero CIL incentive should be given for all residential development on
brownfield land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1240</th>
<th>Respondent:</th>
<th>15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
</tbody>
</table>
We object to all changes in policy H1 Homes for all because they have not addressed many of the 32,000 objections made to the 2016 plan.

We object to the change by way of deletion of the paragraph on density:
“New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.” This indicates that GBC have no intention of building at a higher density within the existing urban area which is desperately needed and is in accordance with existing government policy. To have a plan with no density guidelines in the urban area is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

We support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 7 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London. We object to the change in relation to student accommodation: “About 60 per cent of full time Guildford based University of Surrey eligible students population (full time equivalent) are expected to be provided with student bedspaces on campus.” The University should provide accommodation for 100% of new first year students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required on stilts with parking beneath.

We object to the change in relation to Gypsy, Traveller and Travelling Showpeople pitches and plots. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints. We object in particular to the inclusion of 6 Travelling Showpeople pitches at Garlicks Arch where there is no proven need. We object to the deletion of the paragraph 4.2.8 on density: “We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential.

Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials.” To have a plan with no clear density guidelines is irresponsible and effectively very bad planning since it fails to exploit the development opportunities that urban areas can afford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1241</th>
<th>Respondent:</th>
<th>15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the changes in policy H2 Affordable homes which still do not go far enough to address affordable or social housing need. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, “the viability clause” means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market. GBC has failed demonstrably to provide any significant social housing. Over the last 2 years a tiny 65 units have been built. GBC may have demonstrated a pre-determined agenda to build large numbers of high priced executive boxes for Londoners in the Green Belt but key workers such as nurses and teachers have been ignored.

Opportunities for local not for profit social housing schemes, borrowing from the public sector at low interest rates and using existing GBC land holdings are extensive. But the political persuasion and intent of GBC does not seem to really want to accommodate local people in need. This is a great pity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1242  Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the change in policy H3 Rural Exception Homes. We object to the deletion of para 4.2.51 “ To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme).” This demonstrates GBC’s disregard for local housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
A new Transport Topic Paper has been published by GBC. Items 3.16 and 3.17 (page 10) mention Highways England concerns regarding the Strategic Highway Assessment Report 2016 and two letters. These letters can be accessed from the “Get Involved” website by searching for the Highways England response to the consultation. It seems clear that further modelling will be undertaken before the Examination and it also seems unlikely that it will be consulted on. We consider that any further modelling should include more detailed information so that it can be subject to scrutiny by GBC and the public.

The wording of Policy ID1 has been amended to give an impression that provision of adequate infrastructure will be enforced. However, the reality is that GBC will not determine the required infrastructure. It will be determined by Surrey Highways for the local road network and they are required to support development – not put obstacles in the way. If the Strategic Highway Assessment Report is anything to go by, the requirements will be understated or not even recognised.

Transport assessments supporting planning applications will be prepared by consultants acting for, and remunerated by, the applicant. Improvements to the strategic road network (e.g. A3) will be determined by Highways England, budget constraints, and ministerial decisions. Cllr Furniss has stated that the proposed Blackwell Farm development will not depend on A3 widening (in response to a question from Karen Stevens to the Executive Advisory Board meeting held on 20 April). It seems likely that Highways England have felt the need to offer a reality check on the likelihood of major work on the A3, such as widening or a tunnel, in the foreseeable future – apart from improvements to two slip roads. The policy states that infrastructure will be secured by planning condition and/or planning obligation but this will require enforcement and we doubt the ability and willingness of GBC to overcome developers’ viability arguments. For the permissions that require a longer timescale there could be non-delivery issues if the original developer abandons the project without fulfilling all the conditions and obligations.

Item 4.6.8 still indicates that GBC will be prepared to reduce infrastructure requirements by negotiation, i.e. viability for the developer will take precedence over infrastructure. No change has been made to the monitoring requirement which is based on CIL receipts and spending rather than actual, and timely, delivery of infrastructure.

We object to the new Guildford Borough Council Transport Strategy 2017.

We object to ASP 3 new A3/A3100/B2215/A247 Burpham-Burnt common all-movements junction, formed by a new connector road linking between new A3/A3100 Burpham junction (SRN4) and the B2215 London Road, in combination with the new A3 northbound on-slip (SRN9) and the new A3 southbound off-slip (SRN10) under Infrastructure and Delivery.

If development gets the go ahead for the strategic site at Gosden Hill it would be logical to construct a 4 way A3 interchange at Burpham. The A247 link road to Woking already at capacity will become gridlocked.

We object to SRN4 New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip. This will place an unbearable problem onto the A247 whereby traffic will be passing directly through Send from the A3 and M25 and the proposed new development at Wisley.

We object to SRN9 A3 northbound on-slip at A247 Clandon Road (Burnt Common) and SRN10 A3 southbound off-slip at A247 Clandon Road (Burnt Common). This will place an unbearable problem onto the A247 which is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: pslp171/1255  
**Respondent:** 15805601 / Guildford Greenbelt Group (Sir or madam)  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The removal of item 4.6.17 is puzzling. In the rationale for changes it is described as a potential statement of common ground with Highways England. GBC believe that it is likely to be agreed nearer to the plan Examination – but once again it highlights the lack of control over key roads infrastructure in formulating the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: pslp171/1256  
**Respondent:** 15805601 / Guildford Greenbelt Group (Sir or madam)  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Item 4.6.20 makes a statement that is clearly at odds with the choice of sites which will generate a major increase in private motor vehicle journeys.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: pslp171/1257  
**Respondent:** 15805601 / Guildford Greenbelt Group (Sir or madam)  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4

---

1755
Biodiversity Opportunity Areas (BOAs) seem to have been heavily influenced by the proposal of new identified settlement boundaries, in this draft local plan. The proposal in themselves have not been fully considered; they threaten landscape and biodiversity. Biodiversity will be seriously damaged by the many greenfield development sites proposed. We are suspicious of the use of the phrase “where possible”, which is a letout. Important habitats for biodiversity (outside BOAs) include many which are not adjacent to BOAs. There is no proper concern for protection of such areas.

4.6.45 is misleading. The primary ostensible role of SANGs is to divert recreational use, and dog-walkers in particular, away from the TBHSPA. It is extremely doubtful whether new SANG will achieve its primary purpose. For example, dog walkers are being encouraged to use sites occupied by ground-nesting Skylarks. It is wrong to claim, in effect, that SANG will produce net gains in biodiversity when it will be used to justify the destruction of existing wildlife on greenfield sites by building on it.

Land used for SANG should be made attractive in order to divert recreational use away from the SPA; but this cannot be achieved by a SANG which is adjacent to the SPA or many of the sites proposed.

We object to the introduction of 4.6.49a which appears to be an afterthought to weaken the policy.

Existing biodiversity and recreational use is being ignored by Guildford Borough Council and developers in selecting sites. In practice, SANG is being used in order to avoid any restriction on housebuilding due to the SPA; and is effectively a Trojan horse. Furthermore, all such sites are by definition already green spaces with either biodiversity or recreational uses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The policy relating to Surrey Hills AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

We OBJECT to the loss of the five tests which were previously included. Previously it was suggested that all proposals should be considered as to whether they
- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide or maintain public access to the AONB

These tests are significant and important and the loss of these tests is a serious diminution of the protection afforded to the AONB. They should be reinstated. Similarly the deletion of the presumption against inappropriate development means that inappropriate development is not necessarily going to be rejected – which would seem to be in contravention of the policies and the principles of the AONB, which the borough council has a duty to protect. This too should be reinstated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1244</th>
<th>Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the changes to Policy P2 because they have not addressed many of the 32,000 objections made to the 2016 plan.

We object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development.

In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.

We object to the proposed change that Send Business Park should be inset from the Green Belt due to the fact that: It is effectively a non-conforming user in an area of beautiful countryside adjacent to the beautiful Wey Navigation. It has restricted access along Tannery Lane. It should not be given the opportunity for further expansion or development.

Policy P2 still completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.
We object to the statement in the Draft Local Plan under Green Belt Policy P2 (4.3.13) which claims that 14 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these village. No decision has been made by an Inspector, therefore the villages remain in the Green Belt. We object to the changed “insetting” of 15 villages (including Ripley) from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. We are deeply disturbed that settlement boundaries are to be hugely extended in many villages (including Send) and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside of the OAN. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. Many of the local village should not be removed from the Green Belt. Send, for example, provides an important Green Belt buffer between Woking and Guildford. The village and the countryside behind the A247 should all be protected.

We object to three particularly vulnerable areas of high quality amenity land being taken out of the Green Belt at Send which include:
- The land behind the schools including playing fields and woodland.
- The land to the right of Cartbridge by the River Wey Navigation up to the new boundary fence with Vision Engineering.
- Land to the left of Cartbridge going up to the old depot on the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
NPPF refers to the National Planning Policy Framework  
NPPG refers to the National Planning Policy Guidance  

POLICY S1 SUSTAINABLE DEVELOPMENT  

GGG supports the change to paragraph 4.1.4 “Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

We are of the opinion in terms of clear policy that GBC have made a definitive statement to support the Green Belt. GGG is however disappointed that they have failed to put this policy into practice in forming this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1239</th>
<th>Respondent:</th>
<th>15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GGG objects to the amended policy S2 the Borough Wide Strategy and the commitment to build 12,426 homes based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn because it has not addressed many of the 32,000 objections made to the 2016 plan.

The OAN “objectively assessed need” figure of 12,426 is far too high. The committee of GGG are very surprised and concerned that GBC have adopted the OAN of 12,426 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50%. Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However, it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt.
A detailed and comprehensive professional review of the SHMA dated June 2017 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 560 homes per annum to 400 homes per annum. The 19 page report by NMSS which can be found on the GRA website entitled “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan.

The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. The NMSS recent study has found that the latest SHMA update by GL Hearn 2017 over estimates population growth for Guildford. The report shows that an indication of the scale of the problem can be obtained directly from the ONS’s own data. Their estimates of births, deaths and population flows into and out of Guildford suggest that the population should have grown by 15,000 between the 2001 and 2011 censuses. The censuses, however, record a population growth of only 7,800. The discrepancy is over 90% of the population change indicated by the censuses.

The analysis in the NMSS report demonstrates that the errors must be in the population flows in age groups in which there are significant numbers of students. They are almost certainly the result of the under-recording of the numbers of students leaving Guildford each year. If the projections are based on under-estimates of the number of students leaving the district each year, they will assume that people will be living in the area who will in fact have left. This means that they will over-estimate the likely growth in Guildford’s population. The ONS’s projections envisage that the population will grow by 21,700 between 2015 and 2034. However, if the estimates of past migration flows are adjusted to make them consistent with the census figures, this could fall to 13,000. As a consequence, the demographically-based estimate of the number of homes needed would be 400 homes a year (2015-34), not 580. 70% of the sites put forward in the Local Plan are still in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries.

Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 580 per annum to 400. We object to the fact that GBC have not used the guidance available to reduce the number of houses they propose.

GBC has not taken into account the possibility of lowering the required number of houses by adhering to the restraints offered in various papers. Government guidelines, even before the publication of the Paper, quoted below say that if a Council cannot supply sufficient houses without impinging on the Green Belt, then they do not have to build so many houses.

GBC have gone against the NPPF as they are not adhering to the ruling that Local Plans must plan positively to seek opportunities that meet objectively assessed development needs and be flexible enough to adapt to rapid change unless any adverse impact of doing so would significantly outweigh the benefits or specific policies in the NPPF which suggest that development should be restricted. House of Commons Briefing Paper ; Planning for Housing no 03741, 14 June 2017. Guidance on taking account of constraints. “Need alone, is not the only factor to be considered when drawing up a Local Plan”. This includes “land designated as Green Belt” and “SSSIs”.

“The framework makes clear that once established Green Belt boundaries should only be altered in exceptional circumstances” and “should take into account any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (P d055 ref ID.3-045-20141006 In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is
not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 200 homes per annum which over a 20-year period would be 4,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 32,000 objections made by residents to the 2016 draft plan and also relieve the additional problems of inadequate infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GBC have failed to apply any reduction which makes the plan undeliverable and unsound. We believe it would be harmful to the character, quality of life and economy of Guildford not to reduce the housing figure to a number significantly below 12,426 new homes by 2034. I submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site. In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be 400 homes per annum and the housing target after the application of constraints should be in the range of 200 homes per annum and kept under regular review.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

Policy in relation to sustainable development has been changed in a way that runs counter to GBC’s previous predetermined agenda for building on the Green Belt.

Under newly amended para 4.1.4 It is stated that "Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will betaken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the PRESUMPTION WILL NOT AUTOMATICALLY APPLY to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt,
Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.

The National Planning Policy Framework requires that objectively assessed needs should be met unless: “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.” Under this amended policy it is clear that the OAN should be constrained. The specific amended policy described above is of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, is it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective?

Notwithstanding that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.

Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/238</th>
<th>Respondent: 15805601 / Guildford Greenbelt Group (Sir or madam)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the view of the GGG committee it is not sound. The changes do not take account of previous objections including the 32,000 other valid objections that are shown on the GBC website as made to the previous 2016 version. In terms of appraisal of the Local Plan it is vital that those objections are fully regarded, since many have not been taken on board.

As requested, this response reflects only comments on changes to the previous draft; both in terms of new text and also comments on deletions which lack acceptable justification. This is as a result of a specific instruction as given by the GBC Executive that only comments on changes will be acceptable. As a result, GGG requests confirmation that all of the objections to changes made below will be put to the Inspector appointed by the Secretary of State to review the GBC Regulation 19 local plan 2017 and also that all the previous objections to the 2016 draft plan made by GGG will be placed before the inspector and that when objections are fully taken into consideration the draft plan is amended accordingly and re-issued before it is submitted to the Inspector.

Guildford is a constrained borough. 89% of its area is zoned as permanent Green Belt. The road network is already at capacity. We are concerned that GBC have adopted a lower but still grossly inflated OAN of 12,426 homes as a housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. Approximately 70% of the new development proposed in this plan is in the permanent Green Belt.
In the latest plan only 1,300 homes are going to be built in Guildford town which is some 10% of the total development proposed. It is very disappointing that GBC fail to set higher densities for the urban area and have in this latest draft deleted all reference to “density for development” which is normally an integral part of forward planning and development control.

GBC still fail to acknowledge that the application of constraints to housing need in respect of the Green Belt is a sensible and practical approach to development within the borough and is not only what they have done in the past in previous plans but is also what its neighbouring local planning authorities have done.
The current scale of the housing number proposed in this plan, which is based on a flawed SHMA, inevitably increases the onus for the plan to be seen to be sound. A substantially lower number of 4,000 homes, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

It appears that GBC have still failed to grasp the opportunity of following clear government policy to develop in the urban area on previously developed sites. Many of these sites are in their ownership and it would seem a practical and readily achievable alternative which is much more acceptable to local residents.

In the opinion of the GGG committee much of the updated local plan still appears out of date. Current trends in terms of property development such as the marked decline in town centre shopping centres and the need to create modal shift by developing residential uses close to transport hubs appear to have been overlooked.

Unsupported assertions that there is real demand for the expansion of retail, industrial or office space lack credibility especially in the absence of significant planned expansion of residential development in the town centre which is universally acknowledged as a key stimulant for urban economic health. There would appear to be two worrying examples where GBC are taking the role of “developer/landowner” rather than “independent not for profit public sector planner” in so far that they have a pre-determined agenda for building on the Green Belt rather than acting as careful, professional and responsible planner guardians.

Example 1: Policy A43 Garlicks Arch Burnt Common. The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt.

Example 2: Burnt Common Policy A 53. The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/3248  Respondent: 15805921 / Ashill Land Ltd  Agent: CGMS Consulting (Matthew Roe)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
LAND AT TITHEBARN FARM, SEND

Background to the Site
The site currently comprises a series of sheds, surrounded by hardstanding, which have been in storage use (B8 Use Class) since the 1st July 1990. They were historically used as chicken sheds. The site is located within the Green Belt, and also within the 5 km buffer of the Thames Basin Heath SPA.

A resolution to grant planning permission subject to a S106 was given at Guildford’s Planning Committee on 12th July for the ‘demolition of buildings and the development of 13 residential houses, vehicular access, car parking and associated landscaping’ (Ref. 17/P/00523).

Summary of Representations and Recommendations

We submit these representations on behalf of Ashill Land Ltd, with particular interest to their site at Land adjacent to Tithebarn Farm, Send. The representation is submitted in support of development at this site for the following reasons:

1. Paragraph 89 of the NPPF supports the complete redevelopment of previously developed sites (brownfield land) and the draft Local Plan Policy P2 ‘Green Belt’ should adequately reflect the Framework.

2. Guildford’s housing target within the draft Local Plan needs to set as a minimum requirement and be increased to meet the required housing need in the borough.

3. We suggest a flexible approach to the affordable housing policy to have further consideration to viability and deliverability. In addition, to payment in lieu towards affordable housing taking into account site specific considerations.

4. We recommend that the approach to the redevelopment or change of use of non-designated employment sites is reviewed to take into consideration the conditions of existing buildings for employment uses.

The representations, on behalf of our client, to the draft Local Plan, with regards to the above are set out in the following paragraphs.

Green Belt Allocation and Policy

Draft Local Plan Policy P2 ‘Green Belt’ details that certain forms of development are not considered to be inappropriate development within the Green Belt. Specifically included within the draft policy is the criteria for ‘replacement of buildings’ within the Green Belt. The policy dictates the replacement of a building would be appropriate, provided the new building:

• Would be in the same use;
• Is not materially larger than the one it replaces; and
• Is sited on or close to the position of the existing buildings

However, the criteria is too narrow and does not go far enough to fully reflect the guidance for local authorities included within paragraph 89 of the NPPF, with regard to previously developed land within the Green belt. With the above in mind we recommend the following amendments to the wording of the policy:

Furthermore, we would recommend that the policy is broadened to include the tests as set out within paragraph 89 of the NPPF.

Replacement of a building, provided the new building:

• Is on previously developed/ brownfield land;
• Is not materially larger than the one it replaces, and
• Is sited on or close to the position of the existing building.
The policy should therefore be amended to ensure consistency with the NPPF, and ensure that development is not restricted at sites, which are considered suitable for development in line with paragraph 89 of the NPPF.

**Housing**
We support the housing target outlined within Policy S2 ‘Planning for the borough – our spatial development strategy’ to be set as a minimum requirement. The housing target should also be increased. The development of 13 homes at the above site, which is viable, suitable and deliverable for housing development within the next five years, can contribute to this housing need in line with aims of the NPPF.

**Loss of Employment Space**
Draft Policy E3: ‘Maintaining employment capacity and improving employment floorspace’ as drafted does not identify site specific exceptions. It requires marketing evidence for all sites, which are in employment use, and not designated to justify their loss. The draft policy requires an element of flexibility in order to be considered sound. It should therefore be amended to state that where it can be demonstrated that the building or site is unsuitable for continued employment use on the basis of the following criteria, employment floorspace does not need to be protected. The criteria comprise:

- The type of employment use;
- The employment generation of sites;
- The suitability and condition of the employment buildings;
- Economic viability for refurbishment;
- The availability and demand for the employment floorspace; and
- Flexibility in employment floorspace.

This will enable brownfield sites within the Greenbelt (i.e. appropriate development under NPPF, Paragraph 89) to be redeveloped where appropriate, such as Tithebarn Farm, and deliver housing.

**Affordable Housing**
We support a more flexible approach to affordable housing provision outlined within the Policy H2 ‘Affordable Housing’ of the draft Local Plan (2017), which takes into account the viability and deliverability of housing schemes, and would not restrict the provision of more housing on sites such as the Land at Tithebarn Farm.

[See Appendix A in attached document]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [170724_JCG19510_Tithebarn_Farm_Representations_to_the_GB_LPA.pdf](170724_JCG19510_Tithebarn_Farm_Representations_to_the_GB_LPA.pdf) (204 KB)
On behalf of our client, Ptarmigan Land, we hereby provide our comments on the Guildford Borough Local Plan Proposed Submission Draft which was published for consultation on 6 June 2016.

Our client has an agreement in place with the owners of land at Garlick’s Arch, Send Marsh (identified on the Site Location Plan, Site Constraints and Framework Plans enclosed with this response) to develop the site, which is located immediately to the northwest of the A3 trunk road and to the southeast of Portsmouth Road, on the southeastern edge of Send Marsh. Ptarmigan Land is working to deliver a sustainable residential-led development on this site, and they consider that the land at Garlick’s Arch can provide a key contribution to assisting Guildford Borough in meeting its development needs over the plan period. Our client welcomes the opportunity to work with the Council to develop a sound strategy for the delivery of this site.

Having reviewed the current consultation document, we provide comments below on a number of the policies included in the latest draft of the Local Plan. A consultation questionnaire and comments form is also enclosed with this response. We will be pleased to discuss these representations in further detail with the Council in due course.

The site (outlined in red on the enclosed Site Location Plan, Site Constraints and Framework Plans) comprises the allocation in the draft Local Plan identified by Policy A43 as ‘Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley’ and Policy A43a as ‘Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common’. Our client is working with Crownhall Estates and the landowners at Garlick’s Arch to deliver this development, and is willing to offer land either side of the A3 to facilitate the development of northbound and southbound slip roads.

The site is located immediately to the northwest of the A3 (Ripley Bypass), on the southeastern edge of Send Marsh, approximately 2km to the southwest of Ripley and 6km to the northeast of Guildford. The site largely comprises agricultural land, with a relatively small area of commercial land in the centre of the site. High voltage electricity pylons run through the centre of the site across its full length. A substantial tree belt, comprising an element of ancient woodland, screens the northwestern corner of the site, with another patch of woodland located on the southeastern boundary with the A3. A small brook also runs through the eastern portion of the site.

Following previous representations on behalf of the landowners and ongoing engagement with the Council, we welcome the proposed allocation of this site in the draft Local Plan for residential-led development. We set out below our support for the broad strategy and specific elements of the draft Local Plan. We also where appropriate suggest alterations to the proposed policies and supporting text where we consider that these would assist in enhancing the soundness of the Local Plan when adopted.

SUMMARY AND CONCLUSIONS

This document sets out our representations on the Guildford Borough Local Plan Proposed Submission Draft on behalf of our client, Ptarmigan Land. Our client controls the land identified within the enclosed Site Location Plan, Site Constraints and Framework Plans which comprises the vast majority of the land identified within the draft allocations set out at Policies A43 and A43a, and is committed to the delivery of this site for residential-led mixed use development in the early years of the plan following its adoption. This site therefore has the potential to make a valuable contribution towards the Borough’s significant development needs, as well as providing additional benefits such as the dedication of the land necessary to deliver the new slip roads onto the A3 detailed in Policy A43a.

Our client welcomes the release of the site from the Green Belt and its allocation for residential-led development as detailed within Policy A43, and welcomes the opportunity to work constructively and collaboratively with the Council to shape the emerging proposals for the site, informed by an extensive range of technical assessments and masterplanning work. Our client is also broadly supportive of the Council’s proposed overall development strategy as set out within the current consultation draft of the Local Plan, although as detailed above there are certain aspects which we would encourage the Council to consider further in order to ensure all the proposed policies are fully robust and sound, having regard to the tests set out within paragraph 182 of the NPPF.

We trust the Council will take the above comments into account in the production of the final draft of the plan, and we welcome the opportunity to work collaboratively and constructively with the Council as matters progress. Please do not hesitate to contact Iceni Projects should you wish to discuss matters further.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 1300 Garlicks Arch Options RevA - Low Res.pdf (4.2 MB)
- Comments Form_Ptarmigan Land.pdf (254 KB)
- 1300 Garlicks Arch Constraints Plan - Low Res.pdf (1.1 MB)
- 160713_Ptarmigan Land_FINAL_merged.pdf (3.4 MB)

Comment ID: PSLPS16/7745  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A43 & A43a: Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley, & Land for New North Facing Slip Roads to/from A3 at Send Marsh/Burnt Common

As stated above, the vast majority of the land included within the allocations identified by Policies A43 and A43a is controlled by our client, who is committed to delivering a sustainable residential-led development.

It should be noted that the land required to deliver the slip roads onto the A3 (as identified within Policy A43a) is also controlled by our client, and that they are willing to set aside this land for the purposes of delivering the slip roads in conjunction with the allocation of Site A43 for development as currently proposed within the draft policy. Importantly, the development of Site A43 will not be dependent on the delivery of these slip roads, and indeed is likely to be completed in advance of the slip roads, so as to ensure that the site can provide the maximum possible contribution to the Council’s housing needs within the next five years. The enclosed illustrative Framework drawing demonstrates how the site layout and access can be appropriately designed to accommodate these future slip roads onto the A3, which will be independently delivered, on land controlled by and offered by our client by the relevant authorities. Further details of the slip road design are provided in the Highway Design Note enclosed at Appendix A1.

We strongly support the proposed allocation of the land at Garlick’s Arch for residential-led mixed use development as detailed within Policy A43. The provision of a significant number of new residential dwellings on this available and deliverable site will assist in meeting the Borough’s significant housing needs, and will help to create a ‘critical mass’ of population required to achieve a sustainable mixed community in Send Marsh/ Burnt Common. The site is available for development immediately and can be delivered within the next 5 years, as unlike a number of other allocations in the Local Plan it is (a) solely within the ownership of two parties committed to working together with Ptarmigan Land and (b) not reliant on the provision of additional infrastructure prior to development taking place. The delivery of this allocation shortly after adoption of the Local Plan will therefore assist in meeting housing needs in these crucial early years and minimise the cumulative deficit expected when the housing trajectory is assessed against the annualised requirement. We therefore consider Policy A43 to be positively prepared and therefore sound in accordance with paragraph 182 of the NPPF, as it will assist in meeting Guildford’s objectively assessed needs.

The release of this site from the Green Belt, as indicated by the proposed inset boundary on the Proposals Map, is justified by the Council’s evidence base, including the Green Belt and Countryside Study. Volume 2 of the Study assesses the site as only meeting two of the purposes of Green Belt as defined by the NPPF, indicating that the site does not prevent neighbouring settlements from merging and does not preserve the setting and special character of an historic town. Whilst the assessment does consider that the site makes some contribution towards checking the eastward sprawl of the village and safeguarding the countryside from encroachment, in our view the A3 (Ripley Bypass) provides a significant long term, logical defensible eastern boundary to Send Marsh/ Burnt Common. Furthermore, the existing areas of trees/ancient woodland, enhanced with further landscaping, as shown on the enclosed plans would perform the function of checking
eastward sprawl and safeguarding the countryside from encroachment in perpetuity. Accordingly recognisable and enduring new boundaries can be formed to the Green Belt at the southern and eastern edges of the proposed village inset. As such, this site represents a logical and justifiable release from the Green Belt in order to meet the pressing development needs of the Borough established within Draft Policy S2, whilst providing a permanent Green Belt boundary consistent with the guidance contained in Chapter 9 of the NPPF.

We further note that Volume 5 of the Green Belt and Countryside Study finds that potential impacts on the openness of the Green Belt resulting from development at this location could be limited by new tree belts on the site, and that development of this site as a major village expansion would be appropriate as the potential improvements to the sustainability credentials of the village (i.e. contributions towards ensuring the viability of local shops, education, healthcare facilities and services) would outweigh the potential harm to the openness and purposes of the Green Belt. We would also add that as shown on the illustrative masterplan, our client fully intends to remove the high voltage electricity pylons from the site, and re-route the cables underground. The existing pylons represent a significant urbanising feature of the landscape as seen from the existing properties to the north and west, and also in terms of longer distance views from the south on the opposing side of the A3. The presence of the pylons further undermines the existing status of the land as Green Belt, and through the removal of these features and careful planting of landscaping, the outlook from both the A3, and from longer distance views from the south, east and west of the site will be enhanced through the removal of an urbanising feature that encroaches upon the open countryside. We therefore consider the proposed allocation to be entirely justified by the Council’s evidence base and compliant with national policy, and thus is considered sound in accordance with the tests set out at paragraph 182 of the NPPF.

As noted within the Council’s 2016 Land Availability Assessment (LAA), there are no anticipated technical constraints to development of this site, and it is anticipated that it could be acceptably developed for a residential-led mix of uses in a relatively short timeframe following adoption of the Local Plan. The 2016 LAA notes that whilst a small area of the site is located within Flood Zones 2 and 3, the majority is within Flood Zone 1 and therefore not at risk of flooding. Meanwhile appropriate access is expected to be achievable, and there are some existing sustainable transport options which can be improved. Appropriate mitigation of potential impacts on the Thames Basin Heath SPA can be achieved through contributions towards SANG provision, and as concluded by the Council’s assessment, there is no known reason why well designed new homes and commercial uses in this location should have an unacceptable impact on the environment, existing and future occupiers. The main relevant constraints and opportunities for this site are identified on the enclosed Site Constraints Plan, and the initial masterplan prepared on behalf of our client responds specifically to the identified constraints to demonstrate an appropriate, suitable and viable layout for residential-led development A full suite of technical assessments will be undertaken in the coming months to inform further detailed masterplanning work and to demonstrate the suitability of the site for the proposed form and scale of development. The results of these assessments will be presented to the Council and the Inspector in due course.

The enclosed illustrative Framework diagram demonstrates how the proposed development of the site can be achieved, having regard to the identified constraints and opportunities. It is anticipated that the main development parcels will be accommodated around the retained woodland and areas of floodplain, which will provide a green corridor throughout the development and serve to limit the potential impact of the proposals on the openness of the Green Belt adjacent to the site. Send Marsh/ Burnt Common does not currently benefit from any significant areas of park/public amenity space and the site has the capacity to accommodate a large area dedicated to sports facilities/ public open space in its centre as a natural focal point and a hub within which our client will explore the potential to provide appropriate services or facilities for the local community. It is anticipated that the broad development parcel within the southwestern corner of the site, closest to the A3 and the new slip roads, would be most appropriate for an element of employment floorspace. The provision of commercial uses in this area, coupled with a landscape bund and acoustic fence will ensure the amenity of future residents is appropriately protected with regard to noise from the A3, whilst also serving to visually screen the site from the road. Appropriate space within the layout will be left to accommodate the future slip roads onto the A3, and the land will be dedicated for this purpose (with actual delivery of the new infrastructure being undertaken by the relevant authorities at a future date, independent of the proposed development on the wider site).

With regard to transport, the Transport Feasibility Appraisal (TFA) provided at Appendix A1 demonstrates that the delivery of a residential led mixed use development accords with the guiding principles of the NPPF; namely:

- The site is well located to encourage people to travel by a variety of modes;
- Safe and suitable access can be provided for all; and,
• The residual impact of the quantum of development envisaged is unlikely to be severe, albeit is accepted that this will need to be considered in further detail over the coming months.

The TFA also sets out how the A3 slip roads could be delivered, together with the outcome of initial feasibility discussions that have been held with highways officers at Highways England, Surrey County Council and Guildford Borough Council. It is worthy to note that the evidence presented within the TFA shows that the area of land that has been safeguarded is sufficient for the relevant authorities to construct the slip road in accordance with current design guidelines, subject to further detailed work being undertaken having regard to the outcome of topographical surveys and detailed traffic modelling. To this end, it is evident that Ptarmigan Land’s intention to safeguard this land will enable Guildford Borough Council to realise a key aspect of its emerging Transport Strategy, and in particular Strategic Road Network Measures 9 and 10.

With regard to the specific requirements of Policy A43, we support the intention for the site to be delivered for predominantly residential uses. The ownership and physical status of the site render it suitable, viable and appropriate to development immediately, providing a substantial contribution to meeting the Borough’s housing needs in the early years of the Local Plan. Indeed, initial masterplanning work has indicated that in excess of 400 new homes could be achieved, and that up to approximately 500 may be deliverable on this site, subject to further detailed technical assessments and masterplanning exercises. Accordingly, whilst as stated above, the intention to provide an element of employment floorspace is supported - in order to deliver employment opportunities for local people and create a sustainable, mixed community that reduces the need to travel, we would welcome greater flexibility in the wording of the policy, allowing for a sliding scale of development that can deliver “up to 7,000 sq. m” of such commercial floorspace, and/or up to 500 new homes (as opposed to 400). We would also encourage the policy wording to allow for additional flexibility in terms of the specific employment generating uses that will be permitted on this site, so as to enable development to respond to local demand and market conditions.

By allowing for ‘up to 7,000 sq. m of commercial floorspace’ on Site Allocation A43 it ensures that any potential reduction in the amount of commercial floorspace as a result of demand, or potential to provide provision elsewhere in the village inset, would not render the policy wording inaccurate or prohibitive to other options. Consequently, by allowing for an upper ceiling of 500 homes, it would provide additional flexibility in this regard to make efficient use of the land, should the final development provide less than 7,000 sqm of commercial floorspace. It is anticipated that development of the site broadly in accordance with the high level illustrative Framework plan enclosed with this submission would be entirely compliant with such amendments to this policy.

The development of this site as set out in Policy A43 will also result in a number of benefits in addition to the provision of residential dwellings and employment floorspace at an early stage of the plan period to help meet the Borough’s development needs. These are anticipated to include the removal of the overhead electricity pylons currently running the length of the site, which are expected to be replaced as part of the development with underground cables. Clearly this will have a significant positive impact, both in terms of the local visual impact and amenity of local residents, and the general impact of the site on the openness of the surrounding Green Belt. Furthermore, the potential provision of local facilities and the contribution towards a ‘critical mass’ within the village will improve the overall sustainability of Send Marsh/ Burnt Common, whilst the provision of land for the new slip roads onto the A3 will facilitate a very substantial benefit to the local community and the wider Borough in terms of the provision of critical infrastructure.

Having regard to the above, we therefore strongly support Policies A43 & A43a, and would welcome the opportunity to work constructively with the Council in the coming months to ensure the prompt development of the site to achieve the Council’s key aims for this allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


Comment ID: PSLPP16/17159  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)
With regard to the proposed levels of employment provision in the Borough over the plan period, we support the fact that 4.7-5.3 hectares of industrial land will be delivered in order to meet the need identified by the 2015 Guildford Borough Employment Land Needs Assessment. We also support the strategy referred to within Policy E1 to deliver new employment floorspace in Send Marsh/ Burnt Common, as the village represents a sustainable location adjacent to the A3, which provides convenient access to other settlements in the Borough and beyond. The provision of additional employment floorspace in this broad area will assist in delivering a sustainable mixed community, locating employment opportunities in close proximity to residents and reducing the need to travel, whilst also boosting the economy of the rural area. This employment floorspace could potentially be provided on the allocation at Garlick’s Arch, as referred to in the policy, subject to further masterplanning work and consideration as to which site within the inset of the village would be most appropriate to accommodate this development.

We would however encourage the Council to reconsider the wording of the policy that specifically refers to the delivery of employment development at Garlick’s Arch being treated as a ‘Strategic Employment Site’. This would appear illogical, given that paragraph 4.4.6 defines Strategic Employment Sites as comprising more than 7,000 sq. m of employment floorspace (with most existing Strategic Employment Sites having more than 10,000 sq. m of floorspace). Conversely, the proposed employment provision at Garlick’s Arch as set out within Policy A43 comprises “up to 7,000 sq. m” of employment floorspace, which even at the upper end, would clearly be below the threshold for Strategic Employment Sites. Furthermore, we would encourage the Council to ensure that sufficient flexibility is built into the policy consistent with the NPPF. Whilst we support the provision of employment floorspace at Send Marsh/ Burnt Common, and consider that the land at Garlick’s Arch could make a welcome contribution towards the Borough’s employment needs sufficient flexibility needs to be built in to allow for 2 scenarios. Firstly (a) if additional employment provision were to be made elsewhere within the inset of the village, and/or (b) a lower level than the maximum quoted 7,000 sq. m of employment floorspace were to be delivered (subject to appropriate masterplanning and further detailed consideration of site constraints) on the Garlick’s Arch allocation in, the existing wording in Policy E1 which makes specific reference to the land at Garlick’s Arch would no longer be relevant or justified.

Having regard to the above, in order to ensure the policy is sufficiently flexible and is consistent with the definition of Strategic Employment Sites set out within the supporting text, we consider that it is important and necessary to retain the ‘up to 7,000 sq. m’ edit and to delete the reference to the new employment site at Garlick’s Arch being treated as a ‘Strategic Employment Site’. This amendment will ensure that the policy is justified and sufficiently flexible to adapt to suitable alternative options.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17160  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)
Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 refers to the retention and development of local services and community facilities in the inset villages, such as local shops, meeting places, sports venues and cultural buildings. We support this aspiration and actively encourage development that will facilitate the provision of further local services that will enhance the sustainability of villages. Our client is currently exploring the potential to deliver such facilities for local people on the land at Garlick’s Arch in order to boost the sustainability of Send Marsh/ Burnt Common and provide additional benefits for local residents. However, the provision of additional housing of sufficient quantum will assist in ensuring the viability of local shops and services to the benefit of new and existing residents of Send Marsh/ Burnt Common.

The delivery of additional development at Garlick’s Arch will assist in achieving the ‘critical mass’ of Send Marsh/ Burnt Common referred to in Volume 5 of the Council’s Green Belt and Countryside Study, thereby supporting the rural economy by creating additional demand for local shops and services and providing additional funding for local infrastructure and facilities. This will assist in creating a sustainable mixed community, as encouraged by national policy set out in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17156  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the policy’s aspiration for new residential development to deliver a wide choice of homes that can meet a range of accommodation needs as set out within the latest Strategic Housing Market Assessment. We note that development on specific sites should provide a mix of tenures, types and sizes appropriate to the site size, characteristics and location, and welcome the fact that the policy recognises the need to have regard to site-specific context rather than requiring a uniform mix across all development sites in the Borough. We similarly support this site-specific approach to density considerations.

With regard to the provision of Traveller accommodation, whilst we welcome the fact that the Local Plan is seeking to meet the identified need in accordance with the requirements of the national Planning Policy for Traveller Sites. We wish to raise concerns however regarding the requirement within Policy H1 for developments of 500 homes or more to include provision for Traveller accommodation - developments of 500 to 999 homes being required to provide two pitches. We query whether this requirement is based on any particular evidence regarding the desire for those in Traveller accommodation to live on a small site of two pitches alongside the settled community, and whether any consideration has been given to how these pitches would be successfully integrated into the development whilst also meeting the requirements of the Traveller community. In the absence of this evidence, it is unclear how the requirements would effectively meet the needs of Travellers.
Proposed Amendments
Consequently, in order to ensure this part of the policy is sound, in our opinion it is necessary to either remove the requirement for the provision of Traveller pitches as part of large scale residential development in its entirety in the absence of any evidence to support this strategy, or the wording of the policy should be amended to read:

“Traveller accommodation should be provided on suitable development sites of 500 homes or more whilst there remains an identified need…”

Any such update to the wording of Policy H1 would also need to be reflected in paragraph 4.2.24 of the supporting text, which we suggest should also either be removed or updated to read:

“We require Traveller accommodation within suitable development sites of 500 homes or more to help create sustainable, mixed communities with suitable housing for all.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17157  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 sets out the Council’s requirements in respect of affordable housing, stating that affordable homes (at a rate of at least 40%) will be provided on sites providing five or more homes, or sites of 0.17 hectares or more, and on developments providing solely affordable housing. Paragraphs 4.2.38 to 4.2.44 of the supporting text to the policy indicate that such provision will be subject to viability considerations, however there is no explicit reference within the policy text itself to a lower provision being appropriate where viability factors would prevent the development coming forward with at least 40% affordable housing provision. In our view this omission creates an element of ambiguity, and risks the policy being considered as contrary to paragraph 173 of the NPPF, which states that such requirements for affordable housing and other developer contributions should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. The policy without such clarification with regard to viability could therefore be regarded as unsound due to inconsistency with national policy.

Proposed Amendments
In order to strengthen the policy and ensure clarity of interpretation, we therefore consider it necessary to add reference within the policy text itself to the fact that the requirements for affordable housing provision will be subject to such provision being viable, having regard to the guidance on assessing viability set out within the supporting text that follows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17158  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Stuart Mills)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
We support the Council’s Green Belt strategy as set out within Policy P2 and the text which supports the policy. In particular, we support the intention to inset certain villages from the Green Belt, including Send Marsh/Burnt Common, as set out at paragraph 4.3.13 and illustrated on the updated Proposals Map accompanying the Local Plan. This approach is clearly justified by the Council’s evidence base, including Volume 4 of the Green Belt and Countryside Study, which concluded that it would be appropriate to inset Send Marsh and Burnt Common within the Green Belt due to the high density and distribution of existing development and the presence of recognisable and defensible boundaries. In this regard, we consider the proposed removal of the village (including the proposed allocation at Garlick’s Arch – Sites A43 & 43a) to be entirely justified and compliant with national policy set out at paragraph 86 of the NPPF, and therefore sound in accordance with the soundness tests at paragraph 182 of the NPPF.

We also strongly support the indication at paragraph 4.3.16 that the Council considers that exceptional circumstances exist (as required by paragraph 83 of the NPPF) to justify the amendment of Green Belt boundaries in order to meet the Borough’s development needs and promote sustainable patterns of development. We note that the 2015 West Surrey SHMA identifies a very significant housing need for Guildford of 693 dwellings per annum, which compares to a previous requirement under the revoked South East Plan of just 422 dwellings per annum. Meanwhile the 2016 Guildford Borough Land Availability Assessment demonstrates that only a very limited number of the new dwellings required to meet the Borough’s needs can be delivered in existing urban areas outside the Green Belt, as 79% of the Borough is designated as Green Belt. The various volumes of the Council’s Green Belt and Countryside Study assess a number of areas where the existing Green Belt boundaries can be satisfactorily adjusted to assist in meeting this significant need.

The NPPF places a much greater emphasis on seeking to meet objectively assessed needs than previous national policy, and there are clearly a number of significant negative socio-economic consequences that result from a failure to meet housing needs. These include reducing access to housing, increasing inequality and increasing house market volatility. One of the most significant impacts of a lack of housing supply is to reduce affordability, thereby increasing the numbers of concealed households and increasing the proportion of income required to rent. In this context, there is a clear imperative to adjust Green Belt boundaries where the Council’s Green Belt assessment work indicates such an amendment would be justifiable, and as such we consider that exceptional circumstances exist in the instance of Guildford Borough to justify the alterations to the Green Belt boundaries currently proposed. We therefore consider that the Council’s proposed Green Belt strategy is sound in this regard, as it is consistent with national policy, justified in relation to the evidence base, and positively prepared in terms of seeking to meet objectively assessed needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We broadly support the strategy set out within Policy S2 with regard to the delivery of development to meet the needs of the Borough over the plan period, and we specifically welcome the fact that the Council is seeking to meet the objectively assessed housing need of 13,860 dwellings over the plan period as identified in the 2015 West Surrey Strategic Housing Market Assessment. We also support the fact that Policy S2 explains that the targets set out for each year of the plan post-adoption are not a ceiling, thus emphasising that these are minimum requirements and that delivery in excess of these targets is supported.

Having regard to the supporting text to the policy and the housing trajectory set out in the 2016 Land Availability Assessment, it is evident that much of the delivery will occur in the later years of the plan period, when infrastructure delivery will facilitate large-scale allocations to be brought forward. In this context, having regard to the National Planning Policy Framework’s (NPPF) emphasis on significantly boosting the supply of housing as soon as possible, it is imperative that any opportunities to deliver residential sites early in the plan period are maximised in order to minimise the adverse socio-economic impacts associated with an under-supply of housing. Early delivery of those sites which are currently available and unconstrained by such infrastructure requirements should be particularly welcomed in light of the low rates of delivery in the first years of the plan period, in order to reduce the cumulative deficit against the housing requirements as soon as practical.

Considering the Borough-wide strategy for the provision of industrial employment land, we welcome the fact that Policy S2 seeks to provide for between 4.7 and 5.3 additional hectares of B1c, B2 and B8 floorspace, which reflects the demand to the end of the plan period identified in the 2015 Guildford Borough Employment Land Needs Assessment. This would appear to be in accordance with the requirements of paragraph 20 of the NPPF to plan proactively to meet the development needs of business and support an economy fit for the 21st century. As with the supply of housing, early delivery of available and suitable sites should be encouraged to meet the Borough’s development needs as early as practical in the plan period.

Having regard to the above, we therefore consider that the broad strategy to meet the Borough’s development needs as set out within Policy S2 is sound, as it seeks to positively meet the objectively assessed housing and employment needs as identified within the evidence base as required by paragraph 14 of the NPPF. With reference to the tests of soundness set out at paragraph 182 of the NPPF, we therefore consider the broad strategy in Policy S2 to be sound, as it is positively prepared, justified and consistent with national policy. Notwithstanding, we note that delivery of new residential dwellings is anticipated to be below the annual average requirement of 693 dwellings per annum in the early years of the plan, and in this context promoting an maximising the delivery of available sites which do not rely on significant infrastructure should be particularly welcomed in order to minimise the resulting cumulative deficit against this annual average requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We consider that it will be beneficial to discuss in further detail our comments and proposed amendments to the policies referred to in our representations. We will be pleased to discuss in further detail the proposals for Sites A43 & A43a, and to provide a further update on the technical work being undertaken to further demonstrate the suitability and deliverability of this allocation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3649  **Respondent:** 15806849 / Ptarmigan Land  **Agent:** Iceni Projects Ltd (Charlotte Ryan-Elliott)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Representation on the Local Plan proposed submission draft**

3.25 We strongly support the continued intention to allocate the land at Garlick’s Arch within the latest version of the Local Plan for residential-led development. As discussed in our previous representations, the vast majority of the land included within the allocation is controlled by our client, who is committed to delivering a sustainable residential development at this location. Our client is also able to provide the land required to deliver the slip roads onto the A3 as identified within Policy A43a, thereby providing a significant benefit in terms of mitigating the impacts of growth in the area, including at the former Wisley airfield. To this end and in direct response to representations submitted by Highways England to the previous Local Plan consultation, our client is in the process of preparing a Statement of Common Ground (SOCG) with Highways England, Guildford Borough Council and Surrey County Highways Authority.

**Employment Uses**

3.26 The latest version of Policy A43 as set out in the June 2017 consultation document removes reference to the previously proposed B1(c)/B2/B8 employment uses. The area of land our client identified for delivery of the 7,000 sqm of employment uses previously identified in Policy A43 covered approximately 2 hectares. As such, whilst we have no in-principle objection to the proposed deletion of this use, it is important to find an appropriate alternative use for the 2 hectares to ensure a viable and sustainable development, and to ensure employment needs are appropriately provided for elsewhere as necessary. Accordingly, we maintain that this area of the site is entirely suitable for either a) additional housing; b) an alternative appropriate compatible use such as a Care Home; or c) an element of employment (B1(c)/B2/B8) uses if required. Whilst paragraph 4.151 of the Council’s June 2017 Housing Delivery Topic Paper suggests that the employment element of the allocation has been deleted in response to some concerns raised that the employment uses may not be compatible with residential dwellings, we are not aware of any evidence which would substantiate such concerns. Clearly, there are innumerable examples of where industrial/commercial uses have been successfully accommodated within relatively close proximity to residential dwellings, and with appropriate masterplanning and mitigation measures where necessary we are not aware of any technical reasons as to why an element of employment uses could not be accommodated on this site if required. Notwithstanding this, we note that employment uses are now proposed at the site known as ‘land around Burnt Common warehouse, London Road, Send’ (Policy A58) instead, and provided employment needs are appropriately met elsewhere we have no objection to the principle of deleting the proposed employment use for the land at Garlick’s Arch, provided the land which was allocated for employment uses is appropriately utilised for either additional residential development, or an appropriate alternative use such as a Care Home instead.
3.27 The deletion of the proposed employment element of the allocation set out at Policy A43 releases approximately 2 hectares of land and thus clearly presents a key opportunity to make efficient use of the site to maximise the residential dwellings that can be accommodated here be that as standard housing provision or for a specialist form of housing such as a Care Home, thereby assisting to meet the Borough’s very significant housing needs. As noted above in relation to Policies S2 and H1, it is imperative that relatively unconstrained sites which are capable of delivering a significant quantum of residential dwellings within the early years of the Plan following adoption, such as this site, are brought forward as early as possible, and that their development potential is maximised in order to ensure a sufficient supply of housing land is identified.

Travelling Showpeople Plots

3.28 The other principal change to the previous version of the Local Plan published in June 2016 is the proposed inclusion of a requirement for the provision of 6 plots for Travelling Showpeople. We strongly object to this proposed amendment to Policy A43. As noted above, requiring this site to include provision for Travelling Showpeople would be inconsistent with Policy H1, which indicates that sites of 500 homes or more should provide Gypsy & Traveller or Travelling Showpeople accommodation. Clearly, as the site is currently allocated for approximately 400 dwellings, it does not exceed the 500 dwelling threshold set out in Policy H1 (and would not do so even if the 2 hectares previously allocated for employment uses are now utilised for housing) and thus there would not appear to be a policy justification for inclusion of the Travelling Showpeople plots within the allocation. Furthermore, based on the thresholds set out within Policy H1, a site would not be required to deliver 6 pitches or plots unless 1,500 to 1,999 dwellings were proposed. Clearly, the scale of development here is significantly below this threshold. We assume that the thresholds in Policy H1 were devised having regard to a robust evidence base and reasoning regarding the level of Gypsy & Traveller or Travelling Showpeople accommodation that it would be suitable, viable and sustainable to provide alongside a development comprising general market and affordable housing, and as such it would not appear to be justifiable to simply ignore these thresholds in this particular case. We are unaware of any justification put forward by the Council as to why the land at Garlick’s Arch should be an exception in this regard, and we thus consider this proposed amendment to the policy to be unsound and contrary to the requirements of paragraph 182 of the NPPF, as it would not be justified.

3.29 As explained within the June 2017 Housing Delivery Topic Paper, the 6 Travelling Showpeople plots identified for the land at Garlick’s Arch were originally proposed for a much larger allocation in the west of the Borough, known as ‘land to the south of Normandy and north Flexford’ (Policy A46), which was to provide approximately 1,100 new residential dwellings, alongside other uses including retail and community facilities. The proposed deletion of this allocation has seemingly created a requirement to identify additional plots elsewhere to ensure the needs identified in the 2017 Traveller Accommodation Assessment are met, and it seems likely that the Council has simply identified the land made available by the proposed deletion of employment uses on the land at Garlick’s Arch and transferred the outstanding 6 plots onto this site, without any further detailed assessment of justification.

3.30 With regard to the spatial distribution of accommodation for Travelling Showpeople in the Borough, we note that the existing 12 plots in Guildford are located at land at Whittles Drive, Aldershot Road, Normandy, which is allocated for a further two net additional plots at Policy A50 of the draft Local Plan. The Council’s 2017 Traveller Accommodation Assessment indicates that the need identified for additional Travelling Showpeople plots over the plan period, particularly the short term need, arises from overcrowding and doubling-up on these existing plots, and hence there is a requirement to provide additional plots within the Plan to accommodate those Travelling Showpeople at Whittles Drive who do not currently have suitable accommodation. In our view, it would therefore be logical and sustainable to accommodate this need as close as possible to the existing Travelling Showpeople plots, given the likely associations between the families wishing to secure their own plot and those remaining at Whittles Drive. We consider that the provision of additional plots at Send Marsh/ Burnt Common would be a significantly less sustainable option, given the considerable distance between this site and the existing community in the far west of the Borough, which would clearly increase the need to travel between the sites should the relocated families wish to maintain contact with the remaining community at Whittles Drive. Meanwhile it is likely that the services and facilities required to serve the existing community of Travelling Showpeople are already in place in close proximity to Whittles Drive, and thus it would be more sustainable to concentrate additional plots in this area, rather than creating additional pressure on new areas to provide such services and facilities.

3.31 Furthermore, it is unclear whether the existing families at Whittles Drive that are in need of their own plots would actually utilise the new plots in Send Marsh/ Burnt Common, given the significant distance between them and uncertainty regarding whether they would be suitable for these particular Travellers. Given the lack of evidence as to whether these proposed new plots would be suitable in this regard, it cannot be concluded that this element of the policy has been
positively prepared as required by paragraph 182 of the NPPF. Consequently we consider that the proposed amendment of Policy A43 to include provision for Travelling Showpeople plots is unsound, as there is no evidence that this will actually meet the identified need for such plots.

3.32 Having reviewed the Council’s evidence base documents, it would appear that no specific assessment has been undertaken regarding the suitability of the land at Garlick’s Arch for the provision of 6 Travelling Showpeople plots, and that the plots appear to have simply have been transferred from the now deleted site A46 once it had been decided that the employment floorspace previously identified for the land at Garlick’s Arch was to be relocated at site A58. The June 2017 Sustainability Appraisal Update suggests (at Table 10.1) that the land at Garlick’s Arch was identified as an alternative site for the 6 pitches originally allocated for the land to the South or Normandy and north of Flexford on the basis that “[t]here is no available alternative site that can provide Travelling Showpeople plots in the first five years of the plan to meet need”. It is assumed that the reference to the first five years of the plan is actually intended to refer to the first five years following adoption of the plan. Regardless, this commentary would appear to provide the only explanation as to why the Council is now proposing a requirement for 6 Travelling Showpeople plots as part of the development of the land at Garlick’s Arch. However, the Sustainability Appraisal does not provide any further evidence as to why other sites could not accommodate this need within the first five years following adoption of the plan, and as such we consider this proposed amendment to Policy A43 to be unsound, as it is not justified having regard to the requirements of paragraph 182 of the NPPF.

3.33 In order to facilitate a comparison between the strategic sites identified as being suitable for delivery of a portion of Gypsy & Traveller/ Travelling Showpeople accommodation and to demonstrate how the requirements of Policy H1 are intended to be met, we set out in Appendix 1 a table identifying all sites proposed for residential-led development that exceed the 500 dwelling threshold identified within Policy S2, as well as the land at Garlick’s Arch in light of its proposed allocation for 6 Travelling Showpeople plots. It should be noted that those sites allocated solely for Gypsy & Traveller pitches or Travelling Showpeople plots, which will deliver the remainder of the requirement, are not included for the purposes of this comparison. The table highlights that site A29 (‘land to the south and east of Ash and Tongham’) is not currently allocated for any Gypsy & Traveller or Travelling Showpeople accommodation, despite being of a sufficient size to require the provision of 6 pitches or plots. It is unclear why no provision is made for Gypsy & Traveller or Travelling Showpeople accommodation on this site. We understand that planning permission has been granted for development of part of the site already, however the Council has not provided any evidence as to why provision for Travellers could not be made as part of the remainder of the allocation. Based on the trajectory included within the 2017 Addendum to the Land Availability Assessment, the Ash and Tongham urban extension is expected to deliver residential dwellings immediately following adoption of the Local Plan, and thus provides an opportunity for early delivery of Gypsy & Traveller pitches or Travelling Showpeople plots. As such, the Council has not adequately demonstrated a need to provide Gypsy & Traveller pitches and Travelling Showpeople plots on sites under 500 dwellings in order to meet identified needs (in addition to those provided on smaller sites identified for solely for Travellers).

3.34 As discussed above, even if the Council were to consider it necessary to identify sites below the 500 unit threshold in order to meet the identified needs, this would be contrary to the approach identified within Policy H1, and as such this policy would require amending. Any such amendments would need to be justified by the appropriate evidence to demonstrate that delivery of Gypsy & Traveller pitches or Travelling Showpeople plots on sites comprising less than 500 dwellings would be suitable, sustainable and viable.

3.35 Having regard to the above, if additional land is still required to accommodate Gypsy & Traveller/ Travelling Showpeople needs and this cannot be delivered as part of residential-led developments in accordance with the requirements of Policy H1, it may be necessary for the Council to identify additional small sites dedicated solely to Gypsy & Traveller pitches/ Travelling Showpeople plots. We would therefore encourage the Council to undertake a full assessment of potential sites in order to identify any additional capacity in this way if necessary.

3.36 On the basis of the above points, we strongly object to the proposed amendment to Policy A43 to require 6 Travelling Showpeople plots to be provided as part of the residential development of the site. In our assessment, the proposed amendment would be unsound, having regard to the requirements of paragraph 182 of the NPPF, as it would not be justified, positively prepared or effective. A requirement for 6 plots on site A43 would fundamentally contradict the Council’s own policy as set out at Policy H1, and it has not been demonstrated that the provision of Travelling Showpeople plots in this location would actually serve the identified need. Meanwhile the Council has not provided sufficient evidence or justification as to why it would be acceptable in principle to require a site of this size to accommodate Gypsy &
Traveller/Travelling Showpeople accommodation, or why this site in particular would be suitable for such provision (or indeed why this site would be the only/most suitable site to accommodate any outstanding need).

3.37 In order to make the policy sound, we therefore consider that the proposed amendment relating to the provision of 6 Travelling Showpeople plots should be deleted. Should the land originally proposed for employment floorspace on this site no longer be required, we consider that it would be appropriate to increase the proposed quantum of residential development in order to ensure the development of this site, and the contribution it makes towards the supply of housing in the Borough, is maximised. The enclosed vision document indicates that up to approximately 500 dwellings could be appropriately accommodated on the site, or that provision could be made for an alternative appropriate use such as a care home in addition to the 400 homes having regard to the technical and masterplanning work undertaken to date. We therefore request that the Council update the wording of the policy to reflect this potential capacity and ensure that it does not artificially constrain the future development of this site and its potential contribution to the Borough’s housing supply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Appendix 1.pdf (193 KB)

Comment ID: pslp172/3723  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Charlotte Ryan-Elliott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[Text continuing from previous comment]

5 Considerations

We have undertaken a number of technical assessments on the Land at Garlick’s Arch and conclude that there is relatively little to constrain development (see left).

Introduction

The Site is well screened by existing tree stands and woodland and although development will alter the character of the Site, sensitive design will allow development to sit well within its setting. In terms of its landscape value, the Site offers a number of opportunities that could significantly enhance the development and help to create a unique sense of place. Existing features such as mature and Ancient Woodland and waterbodies can all be integrated in a way that adds value to the development.

Provision of access and services is straightforward and the overhead pylons that pass through the Site can be undergrounded to improve visual amenity. The Kiln Lane and the A3 provide a natural boundary to the edge of the village negating any further future expansion into the Green Belt to the south-east. A planted landscape buffer, potentially including a bund and acoustic fence, serves to mitigate any noise generated by the A11.

The plan (left) summarises the key considerations. The following pages describe these in more detail. Full technical reports include:

• Transport and Access
• Utilities
Transport and Access

The NPPF is predicated on the assumption that new developments are located in areas that provide people with a choice of travel modes and are able to provide safe and suitable access for all. There is also a presumption that new developments should only be resisted on highways and transportation grounds when it can be demonstrated it will lead to a severe impact upon the local transport networks.

When considered against this background it is evident that the allocation of the Land at Garlick’s Arch is well placed to accord with these principles. An overview of the benefits associated with the development at the Site is provided below, with a more detailed assessment provided in the Technical Appendices.

Opportunities to walk and cycle

The Land at Garlick’s Arch is well connected to an existing network of pedestrian and cycle routes that have the potential to encourage future residents to make use of these important modes of transport. However, there are currently gaps in the existing infrastructure that may limit existing residents in Send Marsh from using these modes and/or accessing the new community facilities that will be provided at the Land at Garlick’s Arch. For example, there are not any pedestrian crossing points provided between the residential areas to the north of Portsmouth Road and the bus stops that are located adjacent to the Site.

Development at the Land at Garlick’s Arch therefore offers the potential to address these limitations for the benefit of existing and future populations alike. This is likely to include new footways along Portsmouth Road and the introduction of formal pedestrian crossings.

Opportunities to travel by public transport

The local pedestrian network provides excellent connectivity to the local bus network with the closest bus stops located adjacent to the Portsmouth Road/Burnt Common Lane junction. The bus services that operate from these bus stops follow routes that incorporate key local employment and retail centres. It is possible to undertake longer journeys by a combined busrail trip as the bus services that operate along Portsmouth Road also access Clandon railway station.

To ensure good access to public transport to and from the Site, pedestrian links to the existing bus stops on Portsmouth Road will be provided. These can be supplemented by the creation of new bus stops within the Site. The delivery of the latter will be dependent upon the outcome of discussions with local bus operators, but, subject to further detailed review and agreement with the existing operators, it is considered viable to divert either of the existing routes that serve the site without having a significant impact upon their current timetables. The additional patronage as a result of the new residents will be an additional benefit to the viability of the services.

Access to the highway network

The local highway network is focused around Portsmouth Road, which provides a connection to Guildford town centre to the west and Junction 10 of the M25 Motorway to the east via the A3. As part of the Strategic Highway Network, the A3 also links the Site with Portsmouth and the M3 Motorway (via the A31) to the south west. It is therefore evident that the Site is well located with respect to key local centres and the wider region.

However, the A3 does not currently benefit from a junction that caters for all movements. To this end, existing residents of Send Marsh, Burntcommon and the wider area are required to travel relatively long distances to access the A3. This places sensitive areas of the local highway network, including Ripley village centre, under stress.

Development at the Land at Garlick’s Arch provides the opportunity to address this as Ptarmigan Land is willing to facilitate the safeguarding of land for new ‘on’ and ‘off-slips’ to the A3, which forms a key part of GBC’s emerging
Transport Strategy that is being developed to assist with the delivery of the housing and employment requirements of the emerging Local Plan.

Notwithstanding this, an initial highway impact assessment has established that increases in traffic associated with a large scale mixed-use development at the Land at Garlick’s Arch are unlikely to materially affect the operation of the local highway network without the new A3 slip roads in place. It has also been shown that the emerging access strategy for the site will provide a safe and suitable means of access in accordance with the NPPF.

Access to local services

The Land at Garlick’s Arch is relatively well located to a range of facilities and services that can be accessed by walking, cycling and public transport in accordance with the guiding principles of the NPPF. However, it is understood that Send Marsh and Burntcommon have previously received a poor rating from GBC for their access to community facilities.

From a transportation perspective it is considered that a major mixed use development at the Land at Garlick’s Arch will provide a quantum and mix of development that can deliver a step change in the availability of local services. For example, the inclusion of a local centre, new village green and SANG will significantly increase the offer that is available to existing residents thereby reducing the length and frequency of journeys.

Utilities

Data on the location of existing utilities in and around the site has been obtained from the statutory undertakers and this demonstrates that there are no significant constraints to delivery of the Site.

It is proposed that pylons that pass through the site will be under-grounded to improve visual amenity.

Air Quality

We have completed an initial High Level Review of the Air Quality Issues.

A review of current information has indicated that air quality at the Site is likely to be characterised as having low to moderate concentrations of background pollutants exacerbated by contributions from the local road network, principally the A3 Ripley bypass to the south of the Site with current traffic flows exceeding 90,000 vehicles per day. As a result placement of residential units immediately adjacent to this road within the Site will need to be carefully considered.

Given the range of mitigation options available, as detailed in the accompanying reports, and the relatively low concentration of urban background pollutants in this area away from the A3, it is not considered likely that air quality will present a constraint to the granting of outline planning permission for the residential development of this Site.

Archaeology

A desk-based archaeology and heritage assessment has been completed for the Site. The Surrey Historic Environment Record and History Centre have been consulted as have Historic England’s Archive and National Heritage List for England. These and online sources informed a site walkover. No designated heritage assets lie close to the Site and given topography and existing development and vegetation, no designated heritage assets would be adversely affected by development of the Site. Although the general pattern of the landscape is recognisable on 18th century maps, early field boundaries have been removed except on the edges of some woodland where wood banks survive. The only structure on the Site is a large late twentieth century metal and breeze-block building with no special architectural or historical interest. ‘Garlick’s Arch’ itself is a culvert under the road marking the western boundary of the site and this appears to have been replaced in modern times.

There is nothing archaeological recorded for the Site and limited evidence in the area. The land may only have been brought into agricultural use in recent centuries and medieval settlement is likely to have been dispersed and to have lain away from the Site. The construction of the A3 radically redefined the landscape post-war. Past and continuing cultivation and tree roots will have truncated any sub-surface remains which do lie within the Site.
The Site has low archaeological potential. Although sub-surface remain may lie within the Site area, it is almost certain that they would be typical, locally significant features which could be dealt with through further investigation ahead of construction and would not constrain scheme design.

Noise

A noise impact assessment has been prepared to test the site’s suitability for residential development. The assessment has been based on detailed environmental noise measurements and predicted noise levels at the site, under open site conditions.

The noise predictions have been carried using the noise-modelling suite Cadna/A, in accordance with the Calculation of Road Traffic Noise (CRTN) prediction methodologies, based on noise measurements taken at the site.

The assessment has been utilised to develop a masterplan for the site; the built form of which will add significant screening and reduce the effects of noise within the interior of the site.

In light of the findings of this assessment, it is considered with appropriate, acoustically sympathetic design that the site can be feasibly developed for residential purposes, while complying with all relevant British Standards and that noise should not present a constraint to the granting of outline planning permission for the residential development of this site.

Landscape Assessment

The text below summarises the findings of the Landscape and Visual Appraisal and Green Belt Review which accompanies the Vision Document.

The Site is not of noteworthy scenic beauty, and does not contain any landscape features of any particular importance with the exception of the TPO group in the north-eastern part of the Site, and does not afford the opportunity for public outdoor recreation due to the lack of access. It is not within the Surrey Hills AONB.

The Site is well contained and largely screened from view from its surrounding context, with the exception of glimpsed views from the A3 adjoining the south-eastern boundary of the Site and long distance glimpsed views from elevated land to the south. This is due to a combination of topography and the strong vegetation structure present locally within the settlements and wider landscape, including the field boundaries and numerous woodland blocks present locally.

The assessment within the Landscape and Visual Appraisal and Green Belt Review identifies that the contribution that the Site makes to the purposes of Green Belt is limited. The Council’s own assessment also supports this view.

In conclusion, development could be effectively assimilated within the Site from a landscape and visual perspective and would not compromise the purposes and function of the Green Belt. Furthermore, the proposed masterplan improves local visual amenity by relocating visually unattractive pylons and power cables underground for the benefit of the entire village.

On this basis, the Site is considered appropriate for release from the Green Belt for residential development.

6 Vision

The vision for Garlick’s Arch is dual themed.

Liveability: A Good Neighbour

Whilst an important theme is creating a considered, well designed and aspirational approach to site planning, the Land at Garlick’s Arch also seeks to add real benefit to the existing community by enhancing daily village life.

Theme One: Enhance Village Facilities Burntcommon Today

The Land at Garlick’s Arch presents an opportunity to enhance Send Marsh/Burntcommon as a liveable and sustainable village by providing those facilities and amenities you would expect to find in a settlement of a similar size.
Today the village is predominantly comprised of the built-up residential estates of Boughton Court Avenue and the Portsmouth Road forming Burntcommon. As identified in earlier chapters of this document, local facilities extend to a petrol filling station and a Little Waitrose with little else to meet the daily needs of villagers. There is a notable lack of public open space with the village lacking a park, sports pitches and allotments. Community space for social events is also absent.

The Land at Garlick’s Arch presents an opportunity to provide real benefit to the village through the provision of new facilities as part of a ‘community heart’.

Theme Two: Site Vision

The need for bespoke design solutions across the Land at Garlick’s Arch

The Site is divided into southern-northern parts by a stream and mature vegetation. The southern portion of the Site is a large, relatively flat, and irregular shaped field set against the urban context of the existing village edge and A3. The northern portion of the Site is more contained by mature woodland and also comprises a grazed field hillock and two further contained parcels of land.

A bespoke north and south design response

The differing southern and northern site conditions prompt the need for a bespoke design solution to each area. When this design solution is combined with analysis of what placemaking elements would enhance the village, undertaken in earlier sections of this document, a clear rationale for the Site’s organisation takes shape. Conceptually this is best described by the Venn diagram above. The ‘Village’ and ‘Infrastructure’ elements respond to the context of the southern, more urbanised, portion of the Site. The ‘Arcadia’ element responds to the landscape assets of the northern area of the Site.

The character of the ‘Village’, ‘Infrastructure’ and ‘Arcadia’ elements are outlined in the following pages of this document. Where the elements meet a new village heart complete with a village green, convenience shopping and community space is created.

Development Principles

The following sequence of diagrams show the key principles for the development of the Land at Garlick’s Arch.

The Site today

The Site, which covers a total area of circa 30 hectares, is surrounded by mature vegetation belts which provide physical and visual containment to much of the Site, particularly from the north and east.

Pylons extend across the Site, and a telecommunications mast is visible to the south of the Site, which in combination with the adjoining settlement edge of Send Marsh / Buntcommon and the presence of the A3 corridor, exert an urbanising influence on the Site.

The Site is divided into a southern and a northern part by a stream corridor and associated mature vegetation. The Site and wider landscape comprises parcels of woodland, some of which is ancient woodland.

1. Completion of the south eastern extent of the village

Development at the Land at Garlick’s Arch is enclosed by defensible boundaries of neighbouring built areas and the A3. Development at this location provides a logical development parcel in the completion of the village and does not open up the possibility of coalescence or further encroachment in to the Green Belt.

2. Improve Visual Amenity

The Land at Garlick’s Arch provides the opportunity to improve local visual amenity by relocating pylons and power cables underground for the benefit of the entire village.
3. Maintain and enhance visual enclosure and create an acoustic bund to mitigate noise generated by the A3

Retain and enhance natural features including hedgerows, trees and water bodies for the benefit of flora and fauna. The retention of trees and hedgerows provides mature planting with aesthetic value that helps to mitigate the visual impact of future development.

Opportunity to create a tree planted landscape bund to reduce the noise generated by the A3.

4. Create A Woodland Park

Create a woodland park to recognise the value of the existing ancient woodland and stream. The woodland landscape corridors provide new public open space for existing and new residents and are conduits for pedestrian and cycling movement. The landscape corridors link the Garlick’s Arch community to the village and surrounding countryside.

The woodland park provides an attractive outlook for new homes.

5. Mitigate Long Distance Views

Create planted screens and a hillock pocket park to mitigate the potential for external longer distance views.

6. Create a Sustainable Urban Drainage Strategy

The existing topography and proposed landscape corridors provide an opportunity to create a sustainable urban drainage system (SUDS) of swales and ponds to mitigate surface water. The creation of a SUDS network provides the opportunity for semi-wetland habitats to enhance biodiversity. Swales and ponds also provide a place for people to enjoy nature and relax.

7. Establish ‘Arcadia’

Create a sensitive, lower density, Arcadian approach to development in an area of the site with a wealth of valuable natural features including woodland and a stream.

Please see the following page for more information on Arcadia.

7. Establish 'Arcadia'

Introduction

The topography and mature planted landscape encircling the northern part of the Site offers the opportunity to create a unique character through a sensitive, landscape-led design approach. Long distance views into this part of the Site call for a proposal where rooftops blend within clusters of trees rather than dominating the skyline.

An Arcadian approach to development differs from more standard development models by creating pedestrian scaled environments through trees, hedges and shrubs rather than buildings. This allows a greater proportion of buildings to be free standing or clustered in smaller groups rather than space enclosing elements within a wider landscape. This provides a legitimate context for detached and semi-detached clusters of homes which are nestled amongst a dominant landscape.

Arcadia is the creation of the rural idyll by using the picturesque approach to landscape design as typified by the layout of parks of great country houses in the eighteenth century. These landscapes were pioneered by Capability Brown, ‘England’s greatest gardener’, whose approach to landscape was more organic and naturalistic.

A key ingredient of Arcadia is the use of meandering walks and lanes which successively reveal features interspersed within a dominant landscape. In the same way, early ‘leafy’ suburbs of the nineteenth and early twentieth century conceal houses among mature trees so that the visitor is more aware of the landscape setting than of the houses.

Arcadia at Garlick’s Arch should strive for the same effect.
Key ingredients of Arcadia:

- a dominant, naturalistic, landscape
- existing tree cover enhanced by new planting
- front gardens enclosed by hedges in order for the landscape to dominate the houses.
- avoidance of built enclosures such as walls and gates
- detached and semi-detached homes
- a meandering network of paths and lanes
- a sequence of green open spaces
- human-scale enclosure provided by landscape features rather than buildings
- natural materials and colour
- generous, planted, front gardens with buildings set back

8. **Provide sports pitches for the benefit of new and existing residents**

The local area lacks sports provision and a village green. New sports pitches benefit both existing and new residents. The creation of a village green encourages social cohesion and reflects the local settlement pattern of village greens at Send Marsh, Send and Ripley.

9. **Extend the ‘Village’**

Please see the following page for information on Extend the Village.

**Introduction**

The ‘Village’ is an a modern interpretation of the traditional village character found in surrounding historic villages such as Ripley and immediately around Send Manor in Send Marsh.

Key components of the village character include:

- Enclosure created by continuity of built front
- High proportion of dwellings joined to one another in flats, terraces and semidetached arrangement. Individuality of buildings should be encouraged as found in historic towns and villages where individual buildings happen to be joined to one another
- Breaks between buildings for car parking or access to read car parking areas should be bridged over at first floor level
- Buildings on corners to address dual street frontage through openings
- Shallow front gardens to encourage spatial enclosure
- Traditional materials deployed in a contemporary architectural language

**Infrastructure Benefits**

The Land at Garlick’s Arch presents an ideal opportunity to provide a sustainable, residentialled development whilst enhancing the existing settlement’s infrastructure, providing additional benefits to the local community.

Local infrastructure will be improved through the provision of new vehicular linkages through the site, making land available for the creation of new slip roads onto the A3 and improving visual amenity by relocating pylons underground.

10. **Relieving Traffic Pressure at the Send Barns Lane & Clandon/London/Portsmouth Road Roundabout Junction**

Relieve traffic pressure at the Send Barns Lane & Clandon/London/Portsmouth Road Roundabout Junction by encouraging traffic through the Garlick’s Arch site between Portsmouth Road and the A3.

11. **Enable the Delivery of A3 Slip Roads & Junction Improvements**

Enable the delivery of new access slip roads and junctions improvements to the A3.
The site is capable of being delivered entirely independently of the proposed slip roads.

12. Provide a New Village Park & Suitable Alternative Natural Greenspace (SANG)

In accordance with Natural England guidelines, a large area of natural greenspace will be provided for the benefit of local residents. At present, neither the Site or the area where SANG is proposed benefits from public access. A potential location for the provision of this SANG has been identified immediately to the south of the Land at Garlick’s Arch, within easy walking distance of Burntcommon. This would provide immediate positives to the existing and proposed residents in terms of access to local walks, greenspaces, a village green and sports facilities on the Sang and the Site itself which is not currently available. Alternatively, an appropriate contribution can be made towards the funding a nearby SANG already approved by the Council and Natural England.

Introduction

The Suitable Alternative Natural Greenspace (SANG) will be delivered as part of a planning application for the proposed development of Garlick’s Arch, Send. A SANG Management Plan has been produced to accompany a future planning application and provides further information as to how the SANG will be used and managed.

The SANG is proposed as part of the mitigation package designed to ensure there are no adverse effects on the integrity of the Thames Basin Heaths Special Protection Area (TBH SPA).

The scheme’s required SANG provision will be 8ha and the site can provide 16ha.

The overall site consists of an area of pastoral farmland and Ancient Woodland, located within private land. The site includes boundary trees and hedgerows, and internal hedgerows with trees. The site is bordered to the south by Tithebarns Lane, to the west by Tithebarns and to the north by the A3 and the east by further farmland. A Phase 1 Habitat Survey of the site was carried out in September 2016. The arable land is of limited ecological value, although the fields are bounded by native hedgerows which offer some value to wildlife. The hedgerows and associated boundaries have potential for protected species including nesting birds, reptiles and hazel dormice.

The SANG has been designed in accordance with Natural England’s guidance and has involved correspondence and a site meeting with Natural England. The proposed SANG is closely linked to the proposed housing development and is thus intended for local use, plus has car park provision for the additional capacity for other housing developments.

13. Create a Mixed-Use Neighbourhood Heart

Introduction

The meeting of ‘Arcadia’, ‘Village’ and the ‘Infrastructure’ elements of the Site present an opportunity to create a neighbourhood heart for Burntcommon. The heart is a community focal point and includes a village green, convenience shopping and community space to support daily needs.

Village greens are a key component of the local village settlement pattern. This character extends the nearby villages of Send Marsh, Send and Ripley (see right). As identified in earlier chapters of this document, Burntcommon lacks a discernible village heart. The Land at Garlick’s Arch presents an opportunity to create a community focal point for Burntcommon through the creation of a village heart for the benefit of new and existing residents.

Vision

The Land at Garlick’s Arch adds real benefit to the existing community of Burntcommon by enhancing daily village life through the provision of a new community heart that includes a village green, convenience shopping and community space to support daily needs.

The Land at Garlick’s Arch enables the delivery of A3 slip roads & junction improvements. However, the Site is deliverable regardless of whether the slip roads are constructed. The two options showing the vision with and without the slips roads are shown pages 43 and 44.
The Numbers

The Vision support the emerging Local Plan policy by providing for approximately 400 homes.

Community Engagement

Community Engagement is integral to developing the vision for the Land at Garlick’s Arch. Ptarmigan Land has a strong track record in working with local residents, community groups and business groups, as well as locally elected representatives, at each stage of developing their proposals. We firmly believe that successful developments are those where the interests of stakeholders are given full consideration, and where a transparent, proactive engagement strategy is adopted.

This is true for the Land at Garlick’s Arch, where Ptarmigan Land will work closely with local ward members, Send and Ripley Parish Councils, as well as community action groups, to ensure that interested parties are kept up-to-date with the development of the proposals and have the opportunity to help shape them. The wider community will also be invited to take a proactive role in shaping the proposals, through a variety of tailored engagement events.

Engagement activities will be designed to be both appropriate for the stakeholders’ interest, and for the stage of the development of the proposals; allowing for meaningful engagement from the concept stage through to detailed design.

It is envisaged that engagement activities will include:

- One-to-one stakeholder meetings;
- Design-led workshops;
- Public drop-in exhibition events;
- Community update newsletters; and
- A community consultation website.

Early, regular engagement generating effective dialogue will help shape the vision for Garlick’s Arch. This will allow for a scheme that meets the needs of the local community, whilst maximising the opportunity of the site to provide for a sustainable community, and benefits for existing and new residents.

7 Conclusions

This document has been prepared on behalf of Ptarmigan Land in relation to Land at Garlick’s Arch in order to set out a vision for development of the Site for residential-led purposes.

The Site has been identified in the Submission Draft (June 2016) of the Local Plan to be released from the Green Belt consistent with draft allocation A43 of the Local Plan. The identified Site would also make land available for the provision of new slip roads onto the A3, in accordance with Policy A43a of the Submission Draft of the Local Plan.

The Site provides a significant opportunity to create a sustainable community by knitting together the existing ‘ad-hoc’ areas of the village with a new heart and community that is inherently more sustainable. It will help to meet local housing needs. As set out above, the Site is well located having regard to existing residential development in the area and the proximity of existing facilities, and is relatively unconstrained with regard to technical matters such as transport and access, utilities, air quality, noise, ecology and heritage. Development of this Site would not have an unduly detrimental impact on the landscape character of the wider countryside or adjacent Green Belt, and comprises a currently underutilised area to which the public have no access, between existing development on three sides and the A3 on the fourth. Furthermore, the proposed masterplan improves local visual amenity by relocating visually unattractive pylons and power cables underground for the benefit of the entire village.

On this basis, the Site is considered appropriate for release from the Green Belt for residential development. This Site therefore represents a logical opportunity to enhance the character of Send Marsh/ Burntcommon and provide additional homes and local facilities within the settlement, and to provide a more logical and clearly defined southern boundary to the village and the wider Green Belt.
The vision for the Site includes a number of interlocking elements which will create a sustainable, mixed community which will enhance the existing settlement and provide a number of wider benefits. These elements include the provision of a logical, defined edge to the settlement, an improvement to visual amenity, the creation of a pleasant, liveable environment including a woodland park and sustainable drainage measures, and the establishment of ‘arcadia’. New homes and jobs will be provided around a thoughtfully designed heart of the community, incorporating sports pitches and creating the opportunity to provide other facilities such as a village shop of community hall. Local infrastructure will be improved through the provision of new vehicular linkages through the site, and making land available for the creation of new slip roads onto the A3.

Having regard to the various considerations discussed within this document, the Land at Garlick’s Arch presents an ideal opportunity to provide a sustainable, residential-led mixed use development which will assist in meeting Guildford Borough’s housing needs whilst enhancing the existing settlement and providing additional benefits to the local community. Ptarmigan Land look forward to engaging further with Guildford Borough Council, consultees and local stakeholders in order to realise this vision in the coming months and years.

[For full comment, see previous comment's attachments]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3724  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Charlotte Ryan-Elliott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Site provides a significant opportunity to create a more sustainable community at Burntcommon whilst helping to meet local housing needs. The Site is located near to existing facilities within Send Marsh and key centres across the Borough more widely. As detailed in the technical appendices to this document, the Site is relatively unconstrained with regard to considerations such as transport and access, utilities, air quality, noise, ecology and heritage. Furthermore, the Site is well contained within the landscape and could be developed without having an unduly detrimental impact on the wider countryside. By infilling this vacant area of land between the existing residential development to the north and west and the A3 dual carriageway to the southeast, this Site will provide a more logical and clearly defined southern boundary to the village.

There are a number of potential benefits associated with development of the Site. In addition to the provision of a broad range of much-needed family housing that will assist in meeting the Borough’s acute needs, this residential-led development has the potential to provide community facilities/infrastructure to create a more defined and sustainable ‘centre’ to Burntcommon. This will strengthen the sense of place and identity of the area, whilst providing the necessary ‘critical mass’ of population to support the viability of local facilities such as a village shop thereby creating a more sustainable community. Highways improvements associated with the development offer the potential to relieve traffic through Send Marsh and Ripley, and the proposed removal of the high voltage electricity pylons running through the Site would significantly enhance the visual appearance of the Site and wider area. Further benefits of developing the Site are discussed throughout this document.

This Vision Document also identifies the key considerations that will need to be taken into account as the emerging proposals for the Site progress. These include the provision of appropriate mitigation measures to account for noise and air
quality, which have been fully investigated and accounted for in the design and layout of the development. An assessment of the potential impact on the surrounding landscape has also been undertaken to inform the location, design and density of the proposed uses. Highways and access will also be an important consideration; the Site is relatively well served by road, walking and cycling connections and public transport, and opportunities will be taken where appropriate to enhance local connectivity.

Having regard to the various considerations discussed within this document, the Land at Garlick’s Arch presents an ideal opportunity to provide a sustainable, residential-led mixed use development which will assist in meeting Guildford Borough’s housing needs whilst enhancing the existing settlement. The Site is suitably located and relatively unconstrained, and as acknowledged by the Council through the emerging Local Plan, would comprise a logical amendment to the historic Green Belt boundary in order to facilitate development and establish a robustly justified, long term, recognisable and defensible boundary to Burntcommon.

Set out on page 5 is an overview of the Site and its surroundings, followed by a summary of the latest planning policy position relating to this proposed allocation. Chapter 3 of this document identifies a number of the key benefits associated with the emerging proposals, whilst Chapter 4 considers the sustainability of development in this particular location. Chapter 5 provides an analysis of the key considerations which have been taken into account in the design of the Site. Further details regarding the vision for this Site – in particular how it could appear, contribute to and function as part of the wider settlement are provided in Chapter 6. This chapter, which brings together the various elements of the proposed vision into a high level illustrative masterplan. This illustrates how the Site might be comprehensively developed to provide a new sustainable community. Conclusions regarding the Site and the vision for its development are set out in Chapter 7.

About The Site

The Site, which covers a total area of circa 30 hectares, is located to the south of the B2215 (Portsmouth Road) approximately 6.5 kilometres to the north east of Guildford town centre within the administrative boundaries of Guildford Borough Council (GBC) and Surrey County Council (SCC).

The Site lies within land between Send Marsh / Burntcommon and the A3 which forms the southeastern edge of the Site. The nearest settlement to the south of Send Marsh / Burntcommon is Clandon, south of the A3.

The edge of the Site is surrounded by mature planting which provides physical and visual containment, particularly from the north, east and west of The Site. There are reciprocal intermittent views to the A3 to the south. There are also long distance views towards elevated land to the south associated with the Hogs Back Ridge formation.

Pylons extend across the Site, and a telecommunications mast is visible to the south of the Site, which in combination with the adjoining settlement edge of Send Marsh / Buntcommon and the presence of the A3 corridor, exert an urbanising influence on the Site.

The Site is divided into a southern and a northern part by a stream corridor and associated mature vegetation. The southern field is a large irregular shaped field tapering to its south-western corner which appears relatively flat, and falls gently towards the stream corridor (35 – 40m AOD). The northern part of the Site comprises a localised hillock formation (+40m AOD) which comprises a grazed field and two more contained parcels of land to the east. The northern part of the site includes a car workshop yard.

The Site and wider landscape comprises parcels of woodland, some of which is ancient woodland including Garlick’s Arch Copse and the northern part of Oldlands Copse, both of which are within the Site.

Land to the north, east and west of the Site comprises residential development within Send Marsh / Burntcommon. The south-eastern boundary of the Site is defined by the A3 which comprises a total of six lanes, which has a national speed limit. Intervening vegetation and an embankment along part of the southern part of the Site boundary with the A3 partially screens visibility into the Site however, there are stretches of open views into the Site from the A3. The Site’s surroundings include development to the north and west and the A3 road corridor to the south which together have an urbanising effect on the Land at Garlick’s Arch.

The Site is not crossed by any public rights of way (PRoW), is not within an Area of Outstanding Natural Beauty, and there are no listed buildings or conservation areas within the vicinity of the Site.
2 Planning Overview

"... the emerging policy therefore sets out clear support for a residential led mixed use development of this site, to provide a valuable contribution towards meeting the Borough’s housing and economic needs."

The Land at Garlick’s Arch, as identified on page 3, is currently located outside the settlement boundary of Send Marsh and within the Green Belt, as defined by the Council’s 2003 Proposals Map.

As such, existing local planning policies significantly restrict the nature and extent of development that could be achieved on this Site.

However, having regard to the June 2016 Proposed Submission Version of the Local Plan, the Council is proposing to remove the Site from the Green Belt and allocate the Site for residential-led mixed use development. Policy A43 of the emerging Local Plan specifically allocates the Land at Garlick’s Arch for approximately 400 homes.

A number of requirements for the proposed development are also set out within the draft policy, including the provision of appropriate flood risk mitigation, protection of the ancient woodland within the Site and the provision of green corridors and linkages to habitats outside of the Site.

Related to Policy A43, Policy A43a allocates the land immediately adjacent to the A3 Ripley Bypass for new slip roads linking the A247 to the A3. The northbound slip road is to be located within the wider Land at Garlick’s Arch Site identified above.

Associated with the draft allocations, the proposed updates to the Council’s Proposals Map identifies the Site as being within the village Green Belt inset boundary for Send Marsh, and as a specific Site Allocation.

Having regard to the above, the emerging policy therefore sets out clear support for a residential led mixed use development of the Site, to provide a valuable contribution towards meeting the Borough’s housing and economic needs.

3 Why Garlick's Arch?

Why choose to locate new homes at the Land at Garlick’s Arch over another potential location?

The Land at Garlick’s Arch supports the objectives of the Guildford Borough Council’s emerging Local Plan.

Locating development at Garlick’s Arch provides many strategic benefits from improving visual amenity by undergrounding electrical pylons to helping to relieve congestion through Send Marsh/Ripley and providing facilities and amenities missing in the local area.

The Site enables the release of land to deliver new access slip roads and junction improvements to the A3. However the Site is deliverable regardless of whether the slip roads are constructed.

1. Provide sports pitches and a village green for the benefit of the village

The local area lacks sports provision and a village green. New sports pitches benefit both existing and new residents. The creation of a village green encourages social cohesion and reflects the local settlement pattern of village greens at Send Marsh, Send and Ripley.

2. Relieve congestion in Send Marsh

Potential to relieve traffic pressure at the Send Barns Lane & Clandon/London/Portsmouth Road Roundabout Junction by encouraging traffic through the Land at Garlick’s Arch.

3. Create a park for all in the village to enjoy

Send Marsh/Burntcommon lacks a village park. The Land at Garlick’s Arch provides the opportunity to create a new publicly accessible parkland landscape for new and existing residents to enjoy.
4. Create a village heart

Burntcommon lacks a discernible village heart. The Land at Garlick’s Arch provides the opportunity to create a community focal point for Burntcommon through the creation of a new village heart. The village heart includes a village green, convenience shopping and community space to support daily needs.

5. Improve Visual Amenity

The Land at Garlick’s Arch provides the opportunity to improve local visual amenity by relocating visually unattractive pylons and power cables underground for the benefit of the entire village.

6. Easy access to strategic employment, leisure and recreation destinations (10 minutes)

The Land at Garlick’s Arch is connected, by major infrastructure corridors, to nearby larger settlements that include strategic employment, leisure and recreation.

7. Excellent access to major transport corridors including the A3 and M25

The Site is well connected to major infrastructure corridors including the A3 directly to the south of the Site and the M25 which is approximately 6km from the Site.

8. A visually contained Site

The Site is already visually contained and has the capacity to accommodate new development without significant impact on external views.

9. Opportunity to enhance Burntcommon

The Land at Garlick’s Arch provides the opportunity to enhance Send Marsh/ Burntcommon as a well-rounded settlement by providing facilities currently lacking in the local area.

10. Enable the delivery of A3 slip roads and junction improvements

The Site enables release of land for the delivery of new access slip roads and junction improvements to the A3. However the Site is capable of being delivered entirely independently of the proposed slip roads.

11. Provision of SANG

In accordance with Natural England’s established principles, Suitable Alternative Natural Greenspace (SANG) will be provided for the benefit of residents, with features such as walking/ cycling routes and accessible green space. This will be provided either directly by the developer on land immediately to the southeast of the A3 – less than 1km from the Site, or as a financial contribution towards an existing SANG.

12. Creating local jobs

The provision of 400 homes will support a population of approximately 1,000 people that will help to underpin the viability of existing shops and services – i.e. education, health etc. thereby supporting and creating local jobs.

13. Mitigating noise from A3 to local houses

The Land at Garlick’s Arch provides the opportunity to mitigate the impact of noise generated by the A3 for the existing local residents at Burntcommon and Kiln Lane. Mitigation measures include the creation of a landscape bund, acoustic fence and planting screen.

14. Relieving traffic in Ripley
The Land at Garlick’s Arch provides the opportunity to relieve traffic congestion in Ripley by the release of land to enable delivery of northbound A3 slip roads. Currently all local traffic wishing to access the A3 in the northbound direction passes through Ripley High Street (B2215).

15. Completion of the south eastern extent of the village

Development at the Land at Garlick’s Arch is enclosed by defensible boundaries of neighbouring built areas and the A3. Development at this location provides a logical development parcel for the completion of the village and does not open up the possibility of coalescence or further encroachment in to the Green Belt.

16. Management of landscape assets

The Land at Garlick’s Arch includes a number of valuable landscape assets including Ancient Woodland and watercourses which are unmanaged. Development at the Land at Garlick’s Arch presents an opportunity to actively manage landscape assets and enhance their local heritage and biodiversity value.

17. Creation of a sustainable residential community

The delivery of a mix of residential properties will make a valuable contribution towards the Borough’s housing needs, enhance choice within the local housing market and improve affordability for local people.

4 The Audit

The Audit is a comprehensive analysis of the Site and the wider area, encompassing assessment of access to local facilities, landscape and open space, and connectivity.

Selecting a sustainable site

Access to local facilities is fundamental to the concept of locating sustainable development. New development needs the full range of social, retail, educational, health, transport and recreational facilities to allow people, especially those of limited means or mobility, to go about their daily lives without over reliance on a private car.

Building for Life is a tool to assess and compare the quality of proposed neighbourhoods. It is led by the Design Council CABE, Home Builders Federation and Design for Homes. Whilst Building for Life is usually awarded to completed schemes, the site selection criteria has been applied to the Land at Garlick’s Arch to demonstrate the sustainability of the site as a location for future a neighbourhood extension. Building for Life asks:

1) Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

2) Are there enough facilities and services in the local area to support the development? If not, what is needed?

The facilities audit on the next page demonstrates the Land at Garlick’s Arch is a sustainable site location and fully meets the Building for Life criteria through existing local facilities. Shaping Neighbourhoods, a best practice neighbourhood design guide, also suggests the site scores highly as a sustainable location for neighbourhood extensions. This is illustrated on the following pages.

Facilities Audit

Figures 1, 2 and 3 (on the following pages) assess the Land Garlick’s Arch against the accessibility criteria benchmark for new neighbourhoods established by Shaping Neighbourhoods. Fig 1 demonstrates the ideal distances of local facilities for a sustainable neighbourhood. Fig. 2 illustrates how accessible local facilities are from the site in its current form and Fig. 3 illustrates the accessibility of local facilities when the site is built out.

The facilities audit has highlighted good access to a range of facilities, though access to a local centre, local parks and sports pitches is weak. Fig. 3 illustrates that once the site is built out many of the missing facilities are provided meaning the site exceeds expectations of access to facilities by some margin.
In summary the Land at Garlick’s Arch is a sustainable choice for new development and generally exceeds expectations of access to facilities as identified by ‘Shaping Neighbourhoods’: a best practice design guide for new neighbourhoods’ when fully built out.

Connectivity Audit: Road Network

At present the Site is undeveloped. However, as it is used for agricultural purposes it does benefit from vehicular access points onto Portsmouth Road and Kiln Lane, albeit the geometry of these accesses do not accord with current standards for new residential developments. Notwithstanding this, it is noteworthy the predominant land use in this area is residential and the proposals therefore form a natural extension to the existing built up environment.

The local highway network is focused around Portsmouth Road, which is a single carriageway road subject to a 40 mile per hour speed limit. Portsmouth Road provides a connection to Guildford town centre to the west and Junction 10 of the M25 Motorway to the east via the A3. The A3 can be accessed via the A247 (Send Road) and B2215 (London Road) to the west, and the Ockham Interchange to the east. As part of the Strategic Highway Network, the A3 also links the site with Portsmouth and the M3 Motorway (via the A31) to the south west. It is therefore evident that the Site is well located with respect to key local centres and the wider region. The location of the Site in relation to the wider highway network can be seen overleaf.

Connectivity Audit: Public Transport

The local pedestrian network connects to the local bus network with the closest bus stops located adjacent to the Portsmouth Road/Burnt Common Lane junction. Given that the bus services that operate from this stop (Routes 462/463 and 515) follow routes that incorporate Cobham, Esher, Guildford, Kingston, Surbiton and Woking, it is evident that the Site is well located to encourage future residents to travel to key local employment and retail centres by public transport. Furthermore, it should be noted that Route 462/463 also stops at Clandon railway station. As this station is served by circa 8 trains per hour (4 to London Waterloo and 4 to Guildford) it is evident that the Site is also well located for people to undertake longer journeys by a combined bus-rail trip.

Connectivity Audit: Pedestrian Network

It is generally accepted that walking and cycling provide important alternatives to the private car, and should also be encouraged to form part of longer journeys via public transport. Indeed, it is noteworthy that the Institute of Highways and Transportation (IHT) has prepared several guidance documents that provide advice with respect to the provision of sustainable travel in conjunction with new developments. Within these documents it is suggested that:

- The bicycle is a potential mode of transport for all journeys under five miles (Planning for Cycling, 2015)
- The maximum walk distance for commuting is 2 kilometres (Planning for Walking, 2015)
- Walking distances to bus stops should not exceed 400 metres (Planning for Walking, 2015)

Given the location of the Site, it is considered that it is well situated to encourage less reliance upon the private car. The plan, right, shows the Site is well connected with respect to an extensive network of pedestrian and cycle routes providing excellent access to local countryside, including direct pedestrian links to Suitable Alternative Natural Greenspace (SANG), and routes towards Ripley to the north and Burpham and Abbotswood to the south west.

Footways incorporate crossing facilities (i.e. dropped kerbs with tactile paving) along key desire lines. In this regard, the Site is well placed to encourage future residents to make use of these important modes of transport when travelling to and from the Site.

[For full comment and appendix, see attachments]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Technical Appendix.pdf (6.8 MB)  
- Garlicks Arch Vision Document.pdf (7.3 MB)
Comment ID: pslp171/1828  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Charlotte Ryan-Elliott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.23 We note that the current consultation document includes updated figures for the employment requirements for B1(a)/B1(b) and B1(c)/B2/B8 uses over the plan period, with a reduction in the quantum of floorspace being planned for in both categories. However, this would appear to be consistent with the findings of the latest (2017) Employment Land Needs Assessment, and as such we broadly support the fact that the Council is apparently seeking to meet identified needs in this regard.

3.24 Furthermore, the latest version of Policy E1 no longer includes reference to employment uses at the land at Garlick’s Arch, and instead includes a general reference to employment land at Burnt Common. As discussed in our representations on the previous (June 2016) version of the Local Plan, we consider that the employment floorspace required in Send Marsh/ Burnt Common could potentially be provided on the allocation at Garlick’s Arch (site A43). Whilst the Council’s June 2017 Housing Delivery Topic Paper suggests that some concerns had been raised regarding the compatibility of employment uses with the proposed residential dwellings, we are not aware of any technical reason based on evidence as to why an employment use could not be acceptably accommodated within our client’s site with appropriate masterplanning and mitigation measures where necessary. The proposed amendment inevitably frees up approximately 2 hectares of land previously allocated for employment purposes at Garlick’s Arch, and whilst this could also be appropriate for additional housing or indeed a compatible use such as a Care Home, as part of the allocation set out at Policy A43, as discussed further below, should additional land be required in Send Marsh/ Burnt Common for employment uses, we consider that our client’s site would be suitable and available to accommodate this need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1824  Respondent: 15806849 / Ptarmigan Land  Agent: Iceni Projects Ltd (Charlotte Ryan-Elliott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gypsy, Traveller and Travelling Showpeople Pitches and Plots

3.18 We note that Policy H1 (as amended) sets out a requirement for development sites of 500 dwellings or more to provide Gypsy & Traveller/ Travelling Showpeople accommodation as part of the proposals. Whilst it may be broadly reasonable to require the largest sites to accommodate the identified Traveller need for the Borough, the 500 dwelling threshold and required quantum of Traveller provision based on the size of the development set out within the policy do not appear to be consistent with the site allocations as set out within amended Policies A1-A59.
3.19 For example, site allocation A29 (‘Land to the south and east of Ash and Tongham’) does not include a requirement for any Gypsy & Traveller/Travelling Showpeople accommodation, despite being allocated for a total of 1,750 dwellings. Meanwhile sites A24 and A25 are required to provide more Gypsy & Traveller pitches than would actually be required by Policy H1. In addition, the Land at Garlick’s Arch (site A43), which falls below the 500 unit threshold, is also required to make provision. As such, the requirements of Policy H1 in relation to Gypsies & Travellers and Travelling Showpeople do not appear to be consistent with the latest site allocations. To ensure a sound policy basis upon which traveller accommodation is allocated in the Local Plan, the Council should consistently ensure that in accordance with Policy H1 only sites capable of delivering 500 or more dwellings should be required to provide Gypsy & Traveller pitches/Travelling Showpeople plots.

3.20 The provision of Gypsy & Traveller/Travelling Showpeople accommodation specifically relating to the Land at Garlick’s Arch is discussed further in our comments on the proposed amendments to Policy A43.

Self-Build and Custom Housebuilding

3.21 Whilst the requirement to provide self-build and custom build housing as a percentage of development proposals would appear to be broadly reasonable in principle, it is unclear at this stage what the actual need for self-build and custom build is in Guildford. The 2015 West Surrey SHMA noted that there was modest interest for custom and self-build properties in the Housing Market Area, but did not draw specific conclusions regarding the need for self-build and custom build units in each Local Authority area. The 2017 Addendum did not provide any further assessment of need and thus it is unclear to what extent the proposed 5% requirement set out within Policy H1 will serve to meet Guildford’s housing needs in this regard. We therefore encourage the Council to clarify the need for self-build and custom build units over the plan period and how the 5% requirement relates to this need.

3.22 It is also unclear within the supporting text to the policy at paragraph 4.2.27c what a “significant proportion” would comprise, when it states that a significant proportion of dwellings within the first phase of a development should be self-build or custom build. We therefore encourage the Council to clarify what would be regarded as a “significant proportion” in order to ensure the policy and its supporting text provides a clear indication of how a decision maker should react to a development proposal, in accordance with paragraph 154 of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1.2 Our client has an agreement in place with the owners of land at Garlick’s Arch, Send Marsh (identified on the Site Location Plan, Site Constraints and Framework Plans enclosed with this response) to develop the site, which is located immediately to the northwest of the A3 (Ripley Bypass) and to the southeast of Portsmouth Road, on the southeastern edge of Send Marsh. Ptarmigan Land is working to deliver a sustainable residential-led development on this site, and considers that the land at Garlick’s Arch can provide a key contribution to assisting Guildford Borough in meeting its development needs over the plan period. Our client welcomes the opportunity to work with the Council to develop a sound strategy for the delivery of this site.

1.3 Having reviewed the latest consultation document, we provide comments below on a number of the proposed amendments to the draft policies within the Proposed Submission version of the Local Plan. We will be pleased to discuss these representations in further detail with the Council in due course.

2. BACKGROUND

2.1 The site promoted by Ptarmigan Land (outlined in red on the enclosed Site Location Plan, Site Constraints and Framework Plans) comprises the allocation in the draft Local Plan identified by Policy A43 as ‘Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley’ and Policy A43a as ‘Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common’. Our client is working with the landowners at Garlick’s Arch to deliver this development, and has now entered into a legal agreement with the Council to provide the land either side of the A3 to facilitate the development of northbound and southbound slip roads. To that end our client is in the process of preparing a Statement of Common Ground (SOCG) with Highways England, the Surrey County Highway Authority and Guildford Borough Council in respect of the delivery of the slip roads.

2.2 The site is located immediately to the northwest of the A3 (Ripley Bypass), on the southeastern edge of Send Marsh, approximately 2km to the southwest of Ripley and 6km to the northeast of Guildford. The site largely comprises agricultural land, with a relatively small area of commercial land in the centre of the site. High voltage electricity pylons run through the centre of the site across its full length. A substantial tree belt, comprising an element of ancient woodland, screens the northwestern corner of the site, with another patch of woodland located on the southeastern boundary with the A3. A small brook also runs through the eastern portion of the site.

2.3 An extensive range of technical work and ongoing engagement with Guildford Borough Council has informed an emerging development strategy for the site, which is presented in the enclosed Vision Document. This document considers the key opportunities and technical considerations relevant to the site and the valuable contribution that development of the land at Garlick’s Arch can make towards meeting Guildford’s identified development needs.

2.4 Following previous representations and ongoing engagement with the Council, we welcome the proposed allocation of this site in the draft Local Plan for residential-led development. We set out below our support for the broad strategy and specific elements of the draft Local Plan. Where considered necessary, we also suggest alterations to the latest version of the proposed policies and supporting text to ensure the Plan is sound.

Policy S2: Borough Wide Strategy

Overall Housing Requirement

3.1 We note that following the publication of the 2017 Addendum to the West Surrey Strategic Housing Market Assessment (SHMA), the proposed housing requirement has decreased by 1,434 dwellings, from 13,860 in the June 2016 version of the Plan to 12,426 net additional dwellings within the June 2017 version, as a result of altering the previous 20 year plan period from 2013-2033 to a 19 year period of 2015-2034. This in turn reduces the annual requirement from 693 dwellings per annum to 654 dwellings per annum. However, consistent with the conclusions drawn at the Examination in Public (EiP) of the Waverley Local Plan, the base date for the Housing Market Area should be consistent. Accordingly, Guildford Borough Council should ensure that the actual target housing number set within the Local Plan Accounts for any housing provision that has not been delivered to date.

3.2 Notwithstanding, the proposed 12,426 dwelling requirement for the Plan Period matches the Objectively Assessed Housing Need figure identified within the 2017 Addendum to the West Surrey Strategic Housing Market Assessment, and on this basis we welcome the fact that the latest version of the Plan still seeks to meet Objectively Assessed Needs in accordance with the requirements of paragraph 14 of the National Planning Policy Framework (NPPF).
3.3 However, we encourage the Council to consider the inclusion of a buffer within the overall housing requirement for the plan period, in order to ensure the identified Objectively Assessed Need of 12,426 dwellings is met. We understand from the commentary within the June 2017 Sustainability Appraisal Update that the latest version of the Plan allocates some 13,600 dwellings, which provides a 9% buffer above the proposed minimum requirement of 12,426 dwellings for the plan period. However, in order to ensure Objectively Assessed Needs will be met, and to deliver the significant boost to the supply of housing advocated by paragraph 47 of the NPPF, in our view it would be beneficial to incorporate a buffer to the 12,426 dwelling Objectively Assessed Need within the minimum requirement figure itself, in order to ensure the Plan is robust and will fully deliver the Borough’s housing needs. We therefore encourage the Council to increase the minimum requirement figure set out at Policy S2 to ensure it exceeds the identified Objectively Assessed Housing Need.

3.4 Furthermore, we note that the identified housing requirement within Policy S2 does not seek to meet any unmet need arising from elsewhere in the West Surrey Housing Market Area. In particular, whilst Guildford and Waverley are apparently seeking to identify a housing requirement within their respective draft Local Plans which matches their Objectively Assessed Housing Needs, Woking Borough Council’s adopted 2012 Core Strategy includes a housing requirement of just 292 dwellings per annum, which is some 225 dwellings per annum lower than the Borough’s full Objectively Assessed Need as identified within the 2015 West Surrey Housing Market Assessment. We are unaware of any intention for Woking to seek to update its housing requirement in the near future. It would therefore be reasonable to conclude that there is an unmet need of 225 dwellings per annum within the West Surrey Housing Market Area. Having regard to the Duty to Cooperate and the emphasis within the NPPF of seeking to meet Objectively Assessed Needs within the housing market area, and the significant negative socio-economic consequences of failing to do so. As proven by recent Examinations e.g. Waverley and Mid-Sussex it is a requirement to meet a significant element of any un-met housing need carried from neighbouring boroughs in accordance with the duty to cooperate advocated within the NPPF. The Inspector examining the Waverley Borough Local Plan has indicated that he expects Waverley Borough Council to explore meeting up to 50% of this unmet need and thus to ensure soundness of the Plan, Guildford, by implication should explore meeting the balance of this unmet need.

3.5 We note that in similar circumstances, the Inspector examining the Mid Sussex District Plan recently concluded that it would be unsound for Mid Sussex to fail to accommodate a significant portion of unmet housing need arising from its neighbours within the same housing market area in its emerging District Plan, and thus concluded that the proposed housing requirement within the draft Plan should be increased accordingly.[1]

3.6 Consequently there is a clear imperative for Guildford to explore all reasonable options to facilitate the adoption of a housing requirement that includes the appropriate portion of this unmet need. Whilst the 2017 Sustainability Appraisal Update considers the potential for the quantum of unmet need to change taking account of latest projections and forecasts, we note that the National Planning Practice Guidance[2] indicates that housing assessments are not automatically rendered out of date every time new projections are released, and thus the 2015 SHMA may still be considered a reasonable indication of housing needs across the West Surrey Housing Market Area. Meanwhile, whilst the 2017 Sustainability Appraisal Update considers the possibility that Woking’s emerging Site Allocations Plan could allocate sufficient land to exceed the adopted Core Strategy housing requirement, there is no evidence that this is a reasonable likelihood, and indeed the most recent consultation document published by Woking Borough Council indicates that the preferred strategy is to only meet the Core Strategy requirement. It is therefore highly likely that this need will remain unmet unless it can be accommodated by Guildford and/or Waverley.

3.7 In our view, to date, Guildford Borough Council has provided insufficient justification as to why it cannot accommodate at least a portion of this unmet need arising from Woking within the Borough over the forthcoming plan period, as required by paragraphs 47 and 182 of the NPPF. A failure to meet this unmet need would be likely to result in worsening affordability across the West Surrey Housing Market Area and may result in internal migration from Woking to other nearby authority areas such as Guildford Borough, thereby creating additional pressures on neighbouring areas. We therefore encourage the Council to increase the identified housing requirement in Policy S2 to ensure the unmet need within the wider Housing Market Area is met in full. This would likely only require a modest increase in Guildford’s minimum requirement and thus would not necessitate a fundamental adjustment to the proposed spatial strategy, but importantly would ensure the needs of the wider Housing Market Area are met in full.

Gypsies & Travellers and Travelling Showpeople
3.8 We note that the latest amendments to the draft Plan as set out in the June 2017 consultation document seek to reduce the total number of Gypsy & Traveller pitches being planned for over the plan period from 73 as identified in the June 2016 consultation document to 58 pitches in the current document. Meanwhile the total number of plots for Travelling Showpeople being planned for within the Plan remains at 8 permanent plots, albeit the proposed phasing of these plots between 2012-2017 and 2017-27 has been deleted from the latest version of the Plan, presumably due to a lack of delivery to date.

3.9 These requirements would appear to be broadly consistent with the need identified within the 2017 Guildford Borough Traveller Accommodation Assessment. Whilst the need identified specifically for those meeting the planning definitions for ‘Gypsies & Travellers’ and ‘Travelling Showpeople’[3] is significantly lower than is currently being planned for within the draft Local Plan, and notwithstanding the requirements of Policy B of the Planning Policy for Traveller Sites, we note that those who do not meet the planning definition still have a specialist housing need that will need to be accommodated, and which has not been specifically accounted for within the Council’s Objective Assessment of Housing Need. As such, the proposed requirements for Gypsy & Traveller and Travelling Showpeople provision within the latest version of the Local Plan would appear to be broadly in line with the need identified within the Council’s evidence base, albeit the Gypsy & Traveller requirement in Policy S2 would appear to be some 5 pitches higher than the identified need over the plan period.

3.10 We set out further comments regarding the overall strategy and spatial distribution of Gypsy & Traveller pitches and Travelling Showpeople plots below in relation to Policies H1 and A43.

Annual Housing Target

3.11 The proposed amendments to the June 2016 draft of the Local Plan, as set out in the current consultation document, include an updated annual housing requirement table within Policy S2. This takes account of the updated housing requirement of 12,426 net additional dwellings for the plan period and amends the previously proposed annual requirements. In summary, a phased annual housing requirement is proposed, starting at 450 dwellings per annum in the first two years following adoption (2019/20 to 2020/21), and gradually increasing to 850 dwellings per annum in the final three years of the Plan (2031/32 to 2033/34).

3.12 Irrespective of our earlier comments in respect of the overall housing target being increased to account for a consistent base date and the duty to cooperate, the total requirement for the period 2019/20-2033/34, based on the sum of the annual requirements set out in the Annual Housing Target table at Policy S2, is 9,810 dwellings. This results in a residual requirement for the remainder of the plan period (2015/16-2018/19, prior to adoption) of 2,616 dwellings (equivalent to an annual average requirement of 654 dwellings per annum). This is equal to the annual average requirement based on a consistent rate of delivery of the 12,426 dwellings over the 19 years of the Plan. The latest housing supply figures set out in the Council’s June 2017 Housing Delivery Topic Paper indicate that against this 654 dwellings per annum average requirement, in 2015/16-2016/17 just 678 (381+297) net additional dwellings were completed over the first two years of the Plan, resulting in a residual 1,938 dwellings and an adjusted annual average requirement for the remaining pre-adoption period (2017/18-2018/19) of 969 dwellings per annum. Clearly, this would require a significant increase in delivery rates in the remaining years up to 2019/20, and a significantly higher annual completion rate than that set out for the initial years of the Plan following adoption. Indeed, the level of completions required to ensure there will not be a housing supply shortfall on adoption of the Local Plan in 2019 (at 969 dwellings per annum, taking account of the dwellings delivered in 2015/16-2016/17) is higher than the level of delivery anticipated at any point within the remainder of the plan period, based on the Annual Housing Target table at Policy S2. Consequently, in our view it will be necessary to significantly increase the annual housing requirements in the years following adoption of the Plan in 2019 in order to address the likely shortfall in the first 4 years of the Plan.

3.13 With regard to the specific annual requirement figures set out within the latest table at Policy S2, we are concerned that delivery within the early years of the Plan is expected to be very low, with an initial requirement of 450 dwellings per annum in the first two years following adoption, followed by a requirement of 500 dwellings per annum in the subsequent three years. The annual requirements identified within the table do not exceed the annual average requirement of 654 dwellings per annum until 2026/27, some 12 years following the start date of the Plan. By this point the cumulative requirement based on the phased (artificially constrained) annual requirements suggested would be 6,866 dwellings for the first 12 years of the Plan, some 982 dwellings (equivalent to 1.5 years) below the cumulative requirement based on an annual average requirement of 654 dwellings per annum, notwithstanding any unmet need to date. We note that paragraph
4.1.9b explicitly states that this phased approach has been suggested “in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption”. We consider this approach to be unsound, as the Council is artificially constraining the requirement figure to a level which it considers to be achievable based on its preferred development strategy, in order to demonstrate a 5 year supply of housing as required by paragraph 47 of the NPPF. If Local Planning Authorities were permitted to take this approach, the requirements of paragraph 47 and associated sanctions contained within paragraph 49 of the NPPF would be rendered meaningless, as they would be able to simply adjust their annual requirements to suit the predicted housing trajectory, provided the overall housing requirement for the plan period was met by the end date of the plan, thereby ensuring there was never a shortfall in the 5 year supply.

3.14 In our view, the proposed approach of setting constrained variable annual housing requirements, as opposed to relying on the annual average requirement derived from the overall requirement of 12,426 dwellings for the plan period, is unsound, as it would fail to ensure Objectively Assessed Needs were met within the early years of the plan period, contrary to the requirements of paragraph 47 of the NPPF. In the context of national guidance in the NPPG that Plans should generally be updated every 5 years[4], it is highly likely that the Local Plan will be reviewed before the higher delivery rates anticipated in the later years of the Plan are achieved. Consequently, when the Local Plan is reviewed, the artificially constrained housing requirements are highly likely to result in a situation where there is a significant deficit against the Borough’s identified housing needs. In this regard, we consider that the approach would be contrary to national planning policy and thus unsound, as it would patently have failed to meet the full, objectively assessed needs for market and affordable housing in the housing market area as required by paragraph 47 of the NPPF.

3.15 Meanwhile, the phased requirement figures set out in the latest version of the table at Policy S2 represent only a relatively modest uplift in current delivery rates and would actually be a decrease from the 654 dwellings per annum requirement identified for the first 4 years of the plan period prior to adoption.

3.16 Based on the trajectory set out within the Council’s 2017 addendum to the Land Availability Assessment, even when assessed against the significantly constrained annual requirements proposed in the table at Policy S2, the cumulative deficit against the minimum requirements would not be eliminated until 2025/26. Consequently the Council would still be unable to identify a sufficient supply in the early years of the plan period, even with the artificially constrained annual requirements, and this cumulative shortfall would persist beyond the likely date of a review of the Local Plan. Clearly, any increase in the overall minimum requirement as discussed above would further exacerbate this issue.

3.17 The above points highlight the significant need to identify a sufficient supply of housing within the early years of the Plan. Clearly, the artificial constraint of the housing requirement in the first 8 years of the Plan following adoption will have significant implications in terms of affordability and other negative socio-economic impacts as the Objectively Assessed Housing Need will not be met in this part of the Plan. The 2017 Sustainability Appraisal Update highlights the potential risk to delivery in the early years of the Plan given the reliance on a number of large, strategic sites. Consequently we consider that this would not achieve a significant boost to the supply of housing as required by paragraph 47 of the NPPF and would thus be contrary to national planning policy. It is therefore imperative that sufficient small and medium scale sites are allocated that can be delivered in the early years of the Plan to address these issues. In this regard, the land at Garlick’s Arch (as identified at Policy A43) will make a significant contribution towards the supply of housing in the early years of the Plan, and can deliver at least 400 dwellings (a significant portion of the 5 year requirement) within the first five years following adoption due to its relatively unconstrained nature and availability for development. The capacity of such sites should be maximised in order to ensure a sufficient short term supply of housing, and the land at Garlick’s Arch could potentially deliver additional housing than the 400 dwellings identified in this regard.


[4] Reference ID: 12-008-20140306

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID:  PSLPA16/2374</th>
<th>Respondent:  15922337 / Andrew Malcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong>  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:  PSLPA16/4194</th>
<th>Respondent:  15922337 / Andrew Malcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong>  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I understand that the demographic model, behind the Strategic Housing Market Assessment report, has not been made available to Guildford, Waverley or Woking Councils, who commissioned it. Nor is it available for public scrutiny by the people who paid for it. This is not acceptable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:  PSLPS16/4553</th>
<th>Respondent:  15922337 / Andrew Malcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong>  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: PSLPS16/4554</td>
<td>Respondent: 15922337 / Andrew Malcher</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>----------------------------------------</td>
<td>---------</td>
</tr>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4555</th>
<th>Respondent: 15922337 / Andrew Malcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7726   Respondent: 15922337 / Andrew Malcher   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the proposed development at Garlick’s Arch. Garlick’s Arch is in the Green Belt. It is designated as Priority Habitat and Ancient Woodland.

This is an irreplaceable asset and should be protected. The Green belt in Guildford does not “belong” to the people of Guildford alone. Across the county, indeed across the whole of England there are many people who love the Guildford countryside. Countryside like the Hogs Back, for example, “belongs” to us all; our green and pleasant land, the natural landscape and it’s rich biodiversity is part of our common heritage.

Green belt land is a finite resource, once developed it is gone forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4556   Respondent: 15922337 / Andrew Malcher   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4557   Respondent: 15922337 / Andrew Malcher   Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4558  Respondent: 15922337 / Andrew Malcher  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17697  Respondent: 15922337 / Andrew Malcher  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to Plan Policy P6: The leisure and visitor experience</td>
</tr>
<tr>
<td>This policy disregards the natural environment, a key asset of the Guildford countryside which is valued by walkers, riders, cyclists and others from across Surrey. Tourism and visitors do not depend on new visitor attractions and facilities. It is outrageous for Guildford to propose greater use of the River Wey as a “leisure and recreational resource.” The River Wey is critical for water supply and biodiversity; it is a shared resource which is neither owned by nor the responsibility of Guildford alone. This policy is at odds with (i) Policy I4 Green &amp; Blue Infrastructure which states that “waterways will be protected and enhanced”. (ii) Policy P4 Flooding, flood risk and groundwater source production.</td>
</tr>
</tbody>
</table>
The need for Affordable Housing is undeniable, but this is not satisfied by a 10% reduction on the market rate. Families have to split up because the offspring cannot afford to live locally. However the developers who will build on these large ‘new towns’ are not interested in providing ‘affordable housing’. Their sole motivation is profit, and once they get planning permission, they will build the houses that maximise profit, sold to investors and not ordinary families. There are many examples in the locality where developers have wriggled out of the promises they made (for a quota of affordable housing) when contracts were first struck.

The question I ask is, why are these houses deemed necessary?

Pyrford Green Belt Action Group objects to developments which will increase the volume of traffic

2.1 We object to developments causing increased traffic on motorways and arterial roads in Surrey. The M25 and A3 are already highly congested. Proposed developments, particularly at Wisley, would aggravate the position.

2.2 We object to developments which will increase the volume of traffic on minor roads and lanes. Pyrford, Send and Ripley already suffer from serious congestion on village roads. Developments proposed by Guildford Council will increase traffic across Newark Bridge in Ripley into Pyrford up the steep, narrow Church Hill and along Pyrford Common Road. This will increase noise and air pollution damage to Pyrford Common Site of Nature Conservation Importance, and the Wey Valley Biodiversity Opportunity Area. An increased number of commuters from proposed developments in Guildford will be attracted by the proximity of West
Byfleet main line railway station, onto roads already forecast by Woking Council to be at the lowest flow capacity: Category F i.e “forced or breakdown of flow” (effectively nose to tail).
Road traffic is a major cause of air and noise pollution and this damages people and wildlife inside and outside of Guildford Borough, including Pyrford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17202  Respondent: 15922337 / Andrew Malcher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local infrastructure is insufficient as it stands, due to increases in the local population. I have personal experience of waiting 5 hours in A&E for treatment. Children have to be driven to schools at a distance from their homes due to lack of local places. Roads are regularly at a standstill with ‘normal’ commuter traffic and gridlocked when there is an accident or some road works. Air pollution is responsible for many deaths each year. It would take many years of investment to bring infrastructure up to an acceptable level for the current population. Levies on developers will not remedy this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17696  Respondent: 15922337 / Andrew Malcher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of 14 villages from the Green Belt in Guildford, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. I am also concerned that infilling is also proposed outside the settlement boundaries of 11 further villages. “Infilling” is merely a disguise, a pretence for developing Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17200  Respondent: 15922337 / Andrew Malcher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The AONB and Green Belt are national assets, necessary for the health and wellbeing of all the population (this may be the reason for the above average health enjoyed, currently, by the local population). Yet many of the large developments outlined will destroy these precious areas for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17694</th>
<th>Respondent: 15922337 / Andrew Malcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Plan Policy P1: Surrey Hills Area of Outstanding Natural Beauty
This policy weakens the protection of the AONB and the AGLV. These assets are irreplaceable and must have the highest protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9874</th>
<th>Respondent: 15922337 / Andrew Malcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17104  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Pyrford Green Belt Action Group objects to the Guildford Borough Council Local Plan. The massive development proposals in the Guildford Borough Council Plan do not just affect Guildford they affect the whole of Surrey, including Pyrford, and can not be viewed from Guildford Borough’s perspective alone.

Pyrford Green Belt Action Group objects to development on the Green Belt.

1.1 We object to the insetting of 14 villages from the Green Belt in Guildford, and the proposal that infilling is acceptable within a further 12 villages within the Green Belt. We are concerned that “infilling” is also proposed outside the settlement boundaries of 11 further villages.

1.2 We object to the proposals to inset Pyrford’s neighbouring Guildford villages of Ripley, Send and Clandon from the Green Belt. The Green Belt land surrounding these villages fulfils clear green belt purposes as laid down by the National Planning Policy Framework. Development in Send and Ripley would have a direct and detrimental effect on the open spaces and waterways of Pyrford, causing pollution and damage to natural habitats.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17695  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all development in the Green Belt. The Green Belt has a vital role to play in providing clean air, fresh water and local food - and in the mitigation of climate change. The Green Belt is not just for humans, it is also home to wildlife. There is a responsibility to maintain and enhance ecosystem assets for future generations. Once the Green Belt is built over, it is gone for forever. Guildford does not “own” the Green Belt, it merely has responsibility for it’s care.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9875  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9872  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17693  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Plan Policy S1: Presumption in favour of sustainable development
"Sustainable development"? is an oxymoron. No definition of the term is supplied. There is nothing remotely "sustainable" about building hundreds of houses in places where infrastructure is already overloaded, whilst simultaneously destroying irreplaceable Ancient Woodland and/or Green Belt - as for example at Send and Ripley or at Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/9873  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17201  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no such thing as sustainable development. Global Warming is just one example of how we have ‘developed’ too much already. The proposed developments are not self-contained and will give rise to more traffic and stress on all the adjacent towns and villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17692  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the premise of the Plan which is predicated on future population growth figures which can not be demonstrated to be realistic. This calls the whole document into question, thus the Plan is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/1919</th>
<th>Respondent:</th>
<th>15922337 / Andrew Malcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Guildford Borough Council Local Plan.

The document includes a number of objectives:

- Preservation of the AONB and Green Belt
- Sustainable Development
- Development predicated on Infrastructure Improvement
- Provision of Affordable Housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/2029</th>
<th>Respondent:</th>
<th>15922337 / Andrew Malcher</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Consultation Procedure. There are many areas of the Plan which are open to question. This is a large, complex series of documents which requires in depth study and as such the short consultation period is undemocratic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/1897  Respondent: 15922337 / Andrew Malcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

The Pyrford Green Belt Action Group objects to Guildford’s Local Plan as the impact on neighbouring communities including Pyrford has not been considered.

In the words of a past Pyrford resident, the poet John Donne: Guildford is not “an island entire to itself”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/15574  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

OBJECT. To the concept of insetting villages – see P3 above. 40% of new homes will be ‘affordable’ is not realistic as the plan proposes on green field sites and should be concentrated in urban areas local to places of work.

Insetting East and West Horsley flies in the face of reality. 385 homes is an increase of 35%, greater than anywhere else (16% Ash & Tongham and 11% in Guildford Town) and will face legal challenge.

The planned development will swamp the Horsleys with extra cars and people using the schools, shops, station, sports, medical centre, etc., they are dramatically unbalanced, unsustainable and the Plan does not address the provision, or even consider the need for expanding local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPP16/15569  **Respondent:** 15977889 / Charles Kimpton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. To land hungry warehousing, B class uses need clarification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15560  **Respondent:** 15977889 / Charles Kimpton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. There are no exceptional circumstances to justify B1a & B1a expansion into Blackwell Farm area of Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15561  **Respondent:** 15977889 / Charles Kimpton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OBJECT. Recent Government policy reaffirms a change of use from B1a to C3 / office to residential so we do not support the plan’s policy of resisting this change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15562  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. Inclusion of B1c is unnecessary and B1a dilutes the goal of maintaining a high quality Research Park. B1b is should be the primary use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15563  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. Local people should be consulted properly using the sequential approach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15564  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
OBJECT. Tourism does not depend on ‘attractions’ – the rural nature of Guildford should be preserved and promoted like Chester & York

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15565  Respondent: 15977889 / Charles Kimpton  Agent:

Object: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. The town is well served by retail, its uniqueness and character should be supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15566  Respondent: 15977889 / Charles Kimpton  Agent:

Object: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. To the use of district centres for town centre uses

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15558  Respondent: 15977889 / Charles Kimpton  Agent:

Object: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
| Comment ID: PSLPP16/15559  Respondent: 15977889 / Charles Kimpton  Agent: |
|-----------------------------|---------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |
| **OBJECT.** High density development in urban areas is supported. The mix set out in the SHMA is unsubstantiated and therefore should not be taken into account at all. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

| Comment ID: PSLPP16/15570  Respondent: 15977889 / Charles Kimpton  Agent: |
|-----------------------------|---------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3 |
| **OBJECT.** Defined as sold or rented at 80% of market value, it is unlikely they will be rented at 70%. Starter homes will not be made available for local people and countryside would be lost for no benefit |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

<p>| Comment ID: PSLPP16/15575  Respondent: 15977889 / Charles Kimpton  Agent: |
|-----------------------------|---------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3 |
| <strong>OBJECT.</strong> This policy means building anywhere, ignoring historic planning restrictions, it is a Trojan Horse. |
| <strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong> |
| Attached documents: |</p>
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>OBJECT. CIL wrongly encourages development on green field sites requiring heavy infrastructure investment. New developments need to be concentrated in urban areas close to shops and transport links</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15573  Respondent: 15977889 / Charles Kimpton  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>OBJECT. It is not sustainable to build dormitory towns and call them sustainable – the further from the town centre, the less sustainable</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15576  Respondent: 15977889 / Charles Kimpton  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>OBJECT. The current plan envisions building on large areas of countryside – at odds with its concern to enhance biodiversity.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
</tr>
<tr>
<td>Attached documents:</td>
</tr>
</tbody>
</table>
Comment ID: PSLPP16/15571  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. This policy continues to seek to justify development on protected land, contrary to previous responses to public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15572  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. We believe brownfield areas are sufficient to meet all housing requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15567  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. Thames Water has advised Guildford Borough that the current wastewater network is unlikely to support the demand from all the developments envisaged for West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15568</th>
<th>Respondent: 15977889 / Charles Kimpton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

OBJECT. The SANG application for Long Reach, West Horsley is just using agricultural land in order to justify building on other green spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15556</th>
<th>Respondent: 15977889 / Charles Kimpton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy S1 - Presumption in favour of sustainable development

OBJECT. This policy fails to recognise the inadequacy of infrastructure. It is unsustainable and needs to state a restraint on development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/15557</th>
<th>Respondent: 15977889 / Charles Kimpton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
OBJECT. The number of homes – 13860 – has not been properly evaluated by councillors despite numerous requests. Major structural change cannot be justified without substantiated numbers.

Independent consultants have provided detailed criticism. Housing need thus demonstrated, proves no need to build on Green Belt

Guildford appears unfairly to be accepting Woking’s designated ‘need’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/775  Respondent: 15977889 / Charles Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to insetting West Horsley and am most concerned with the housing numbers allocated to our small rural village of West Horsley to be built on Green Belt land.

I am particularly concerned about the west side of West Horsley Village, the land behind Silkmore Lane and Ripley Road overlooking rolling acres of quintessential English countryside, farmland and Hatchlands House parkland. The West Horsley Neighbourhood plan states the value it places on preserving the village boundary as it is.

I strongly object to the proposal of straightening the village settlement boundary behind the houses on Silkmore Lane looking down over the fields towards Ripley Lane – thus opening up the land to development. Image right features one of the paddocks which will be brought within the boundary with listed Oak trees.

There are no “exceptional circumstances”. It is important for future generations to protect this open countryside and the unspoilt character of the village on this west side. The West Side of West Horsley should be included within the conservation are of the village and to be considered as part of the area of outstanding natural beauty.

Please refer to images (right) taken from bottom of footpath leading up to the back of the houses on Silkmore Lane. You will note the absolute monstrosity of a house which was allowed to be built in place of a small pretty Victorian cottage – more in keeping with Weybridge than a country village. It is a complete eyesore and should never have been allowed to be built. No amount of fencing and trees will ever hide this architectural nightmare. All other houses in the lane are unobtrusive and nestle into the village boundary and landscape. There are 14 listed buildings in this particular area and their setting should be preserved for the benefit of future generations.

I ask you to reconsider extending the village boundary which will only be to the benefit of a property developer who will exploit the land for his own monetary benefit and have long term detrimental effect on the village and affect the enjoyment and pleasure this open countryside offers to village residents and visitors from the towns and cities alike.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: CDK letter July 2017_Redacted.pdf (541 KB)

---

Comment ID: pslp171/1510  Respondent: 15977889 / Charles Kimpton  Agent:
Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing.

High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic.

Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1517  Respondent: 15977889 / Charles Kimpton  Agent:

The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1499  Respondent: 15977889 / Charles Kimpton  Agent:
The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1509</th>
<th>Respondent:</th>
<th>15977889 / Charles Kimpton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1498</th>
<th>Respondent:</th>
<th>15977889 / Charles Kimpton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/17199  Respondent: 15995585 / Helen Ridley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I wish to emphasise my concern over the inevitable effect on local wildlife as a result of damage to the Ancient Woodland.

I beg you to think carefully before causing irreversible damage to our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8308  Respondent: 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically in relation to the former Wisley airfield/Three Farms Meadows (FWA/TFM), OPC OBJECTS to the inclusion of that site in the Local Plan. These objections have been made consistently by OPC and others in relation to, inter alia, the GBC’s 2013 draft Local Plan and Planning Applications for development or use of FWA/TFM, documented in, inter alia, OPC’s letters to GBC dated 25 November 2013 (Local Plan), 4 June 2014 (Local Plan), 22 September 2014 (Planning Application), 29 March 2015 (Planning Application), 29 January 2016 (Planning Application), and 19 April 2016 (Local Plan). By way of example, copies of OPC’s letters of 22 September 2014, 29 March 2015 and 29 January 2016 are attached.

OPC’s objections include, in summary:

1. FWA/TFM was included in the draft 2013 GBC Local Plan and was widely objected to. That draft Plan was eventually withdrawn after many months of consultation and deliberation.

2. The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Reference: 15/P/00012), as subsequently amended, for a phased development of over 2000 dwellings at FWA/TFM was after 14 months decisively and unanimously rejected by GBC on 8 April 2016 following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:
• was an inappropriate development within the Green Belt;
• would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of its designation;
• failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt;
• failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;
• was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
• would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on local road networks;
• failed to deliver the required transport sustainability measures;
• was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
• would result in loss of the safeguarded waste site;
• presented a dense and urban form of development owing to its quantum and scale;
• had an adverse impact on the setting and significance of a designated heritage asset;
• had an unacceptable air quality impact;
• impacted on education infrastructure;
• impacted on policing infrastructure;
• impacted on health infrastructure;
• impacted on library provision.

1. Both similar and other objections and concerns had been raised by OPC, neighbouring borough and parish councils, Surrey County Council, University of Surrey, Thames Water, NATS, the Environment Agency, Police Authorities, Highways Authorities, residents’ associations and many individuals - both in the context of the planning application and in relation to the current and earlier GBC draft Local Plans.
2. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt. The retention of the site from the Green Belt or its development. To the contrary there are overwhelming reasons for retaining the site as Green Belt not just for Ockham but also the wider community.
3. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath Special Protection Area.
4. The value of FWA/TFM as a community asset and as a vital “lung”, not least because of the dangers and possible illegality of increasing pollution and decreasing air quality as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding areas.
5. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets and surrounding villages.
6. The total unacceptability and disproportionality of the threat posed to Ockham, an historic rural village with around 160 existing Conservation Areas and many listed properties – which would be completely subsumed by a 2000+ dwelling development, higher than most London boroughs. Ockham’s existing population of just over 400 would be increased over 15 times.
7. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of Ockham’s population, as evidenced in the existing Ockham Parish Plan and the emerging Lovelace Neighbourhood Plan.
8. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and road safety, with increased vehicle movements (an estimated 4000 additional cars plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are already at capacity, and on local services and infrastructure.
9. “The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2, 3a and 3b agricultural land – Grade 2 and Grade 3a).”
10. The fallacious nature of claims made that FWA/TFM should be regarded as “brownfield” or previously developed. It should be noted that the runway are within the 0-400m exclusion zone of the SPA, and the remainder of the old runway is (of course) flat where any development would have a major impact on the openness of the area. Much evidence exists that the adverse consequences of development of the site, including damage to the ecology of, e.g., the Bagshot Heath SSSI, can be demonstrated by the fact that the 0 -400m exclusion zone of the SPA was recently by the inability of the current landowner/ developer and its many experts and advisers to come up with a sustainable development plan.
11. The impossibility in practical terms of creating a sustainable development on FWA/TFM which is further demonstrated by the fact that even the current landowner/ developer and its many experts and advisers have consistently argued.
12. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and at Wisley.

CONCLUSION

The above objections graphically demonstrate why FWA/TFM was and should remain in and be part of the Green Belt, and why the location far from places of employment, and existing overstretched and inadequate public transport, roads, services and facilities make the site totally unsuitable for any kind of significant development – as OPC and others have consistently argued.
The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development, and amounts to disregard for widespread local and further afield opinion.

The repeated attempts in numerous guises over the last 3 years to take FWA/TFM out of the Green Belt and to press for both major and ancillary development of the site have, as OPC has previously pointed out, stretched the patience and goodwill of local communities, not least Ockham Parish, have imposed heavy and unwarranted costs and burdens on those local communities, have caused a blight on the area, distress to local residents and farming businesses, and have adversely prejudiced peoples’ lives and livelihoods.

OPC therefore strongly OBJECTS to this further and unwarranted attempt to exclude FWA/TFM and other parts of Ockham Parish from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Ockham Parish Council - 12 July 2016.doc (46 KB)
- OCKHAM PARISH COUNCIL Local Plan Supplementary Letter - 14 July 2016.docx (26 KB)

Comment ID: PSLPP16/18665  Respondent: 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. The Local Plan offers too much land for development, based on a flawed Strategic Housing Market Assessment, and an artificially inflated Housing Target not justified by actual or reasonably projected demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18667  Respondent: 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Against this background, OPC OBJECTS to the Local Plan overall on the following grounds:

1. The Local Plan proposes major, unjustified and unacceptable erosion of, and removal of villages or major parts thereof from, the Green Belt.
2. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.
3. The housing number of 693 houses per year from the Strategic Market Housing Assessment is based on flawed analysis, is far too high and is challenged by neutral experts in the field. The direct and indirect impacts of Brexit are likely further to reduce housing demand in London, the Southeast and not least Surrey.

4. New houses, schools and services should be developed in or adjacent to areas of actual demand and not in relatively remote areas which inevitably and unnecessarily result in major increases in travel requirements from home to work, work to home, home to school, etc.

5. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.

6. The continued inclusion in the Local Plan of the former Wisley airfield (which is located in Ockham and which is known locally as Three Farms Meadows) is perverse and illogical, and is unsound for reasons of sustainability, deliverability and need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18664  Respondent: 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. The Local Plan places growth above: the ongoing viability, character and “liveability” of Guildford town centre and neighbouring villages; protection and maintenance of the countryside, the Green Belt, and protected wildlife areas such as the Thames Basin Heath SPA; the adequacy of existing and planned infrastructure; and remedying the chronic traffic congestion in and around Guildford, along the A3, and local rural roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2124  Respondent: 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Despite GBC’s claims to the contrary, the Local Plan has failed in a number of key areas to take into account or to answer many valid comments and criticisms submitted by thousands of residents and organisations in respect of e.g. the 2013 Draft Local Plan. This is unacceptable, and raises questions of governance and vested interests.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/18666  Respondent: 16058113 / Ockham Parish Council (Ockham Parish Council Alyson Blackwell)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

5. The purpose of the Local Plan should be to enhance the quality of life of the Borough’s resident population, not to increase those aspects which cause the most dissatisfaction: traffic congestion and pollution are not eased by increasing the amount of traffic; inadequate infrastructure, whether schools, services, or sewerage, is made worse not better by increasing demand; and building houses, schools or other facilities in places furthest from existing areas where people live or work merely increases problems of inconvenience, travel, and development sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3219  Respondent: 16206593 / Bloor Homes (Rebecca Fenn-Tripp)  Agent: Turley (Donna Palmer)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.46 We strongly support the proposed allocation of land at Gosden Hill Farm, Merrow Lane for a residential mixed use development. It is considered the site represents an appropriate location for such an allocation and that the proposed mix of uses will create a vibrant, mixed community. The sustainability of the site will be further enhanced by the range of infrastructure requirements proposed to support the allocation including the proposed park and ride facility, improved junction with the A3 and contributions towards delivering Guildford East (Merrow) railway station. These credentials were recognised through the assessment of the site in the Sustainability Appraisal (June 2016) and are not detrimentally altered by the proposed amendments to the policies as confirmed in the 2017 Sustainability Appraisal.
2.47 Our client’s control the northern most parcels of land that form part of the proposed allocation site. These parcels can deliver part of the proposed residential development or other supporting uses as part of the wider draft allocation site. Bloor Homes will work with the promoters of the wider allocation to ensure the delivery of the proposed allocation. There are no known technical constraints which would prevent development of this part of the site coming forward subject to appropriate design and mitigation as could be secured through any future grant of planning permission.

2.48 In addition to the land parcels contained within the proposed allocation, Bloor Homes also control wider land to the east of these parcels currently comprised of Nutbourne Farm. It is considered that these parcels would form a logical extension to the proposed allocation which would assist in increasing the capacity of the proposed allocation site. This is of particular importance in light of the concerns identified above in respect of the Council’s proposed housing requirement and supply. These matters are discussed in detail in Section Three. However allocating additional land to the north of the Gosden Farm would assist in meeting the needs of the Housing Market Area in a sensible and logical way. Whilst it is acknowledged that the additional land is currently Green Belt, its release will have no greater impact on the landscape than the draft allocation at Gosden Farm. The additional parcels being referred to are currently used for car boot sales as well as agricultural purposes and therefore already support a ‘use’ as opposed to being truly green field. Indeed the site could be argued as being brownfield which weighs in favour of its release from the Green Belt.

3. Nutbourne Farm – Land to the east of Gosden Hill Farm

3.1 As discussed in Section Two, in addition to the land parcels contained within the proposed allocation, Bloor Homes also control wider land to the east of these parcels currently comprised of Nutbourne Farm (see plan at Appendix One). It is considered that these parcels would form a logical extension to the proposed allocation which would assist in increasing the capacity of the proposed allocation site. This is of particular importance in light of the concerns identified in Section Two in respect of the Council’s proposed housing requirement and supply, including the need to help meet the needs of adjoining authorities.

3.2 The suitability of land to the east of Guildford as a location for strategic growth has been recognised by the Council through the allocation of the Gosden Hill Farm site and is supported by the Council’s detailed evidence base.

3.3 It is considered that the land controlled by Bloor Homes, at Nutbourne Farm would have the capacity to deliver circa 300-400 homes with an associated extension to the SANG currently proposed to support the Gosden Hill Farm allocation. This development would represent an entirely logical extension to the current draft allocation and would assist the Council in meeting their housing needs.

3.4 The additional parcels being referred to are currently used for car boot sales as well as agricultural purposes and therefore already support a ‘use’ as opposed to being truly green field. Indeed the site could be argued as being brownfield which weighs in favour of its release from the Green Belt.

3.5 The Council has previously assessed the site against the Green Belt purposes as part of parcel C3, as shown on the plan below. [See page 1 of Appendices for plan]

3.6 The table below sets out the Council’s assessment of the wider parcel against the Green Belt purposes and our commentary on these in respect of the site itself. [See page 2 of Appendices for table]

3.7 The site is located within Flood Zone One and as such is an appropriate location for residential development subject to appropriate drainage design. There are no known drainage or flooding issues and a planning application would be supported by a detailed Flood Risk Assessment.

3.8 An area of ancient woodland is located on the site’s eastern boundary. This would be retained and protected as appropriate as part of the development of any proposals for the site.

3.9 EDP, on behalf of Bloor Homes, has undertaken a Preliminary Ecological Appraisal of the site. This has concluded that the designated sites, habitats and species potentially present within and around the site do not pose an ‘in principle’ constraint to development of the site. There are no statutorily or non-statutorily protected nature conservation interests within the proposed development site or off-site that would be materially affected by the proposals, subject to the appropriate provision of SANG either on or off-site.
3.10 The habitats present on site are generally of low (site level) intrinsic ecological value, such that development of the site would have a minimal effect on local biodiversity. Some habitats considered of local level value are present, as well as higher value offsite semi-natural ancient woodland, but subject to appropriate masterplan design, in accordance with the design principles outlined above, adverse effects upon these habitats can be readily avoided, mitigated or compensated for a net gain to biodiversity achieved.

3.11 A Preliminary Landscape Appraisal has also been prepared by EDP in respect of the proposed development of the wider Bloor Homes landholding. The Appraisal concludes that overall this is a landscape denuded of much of its historic landscape fabric. Topographically, and in terms of its landscape fabric, there are few material constraints to either site layout or capacity. The findings of EDP’s test of the site against the main purposes of Green Belt has shown that, whilst the site does contribute to the openness of the Green Belt in part, it is not considered to be a highly functioning part of the Green Belt as it is a partially enclosed site detached from the wider landscape character, with some urbanising elements, which is only seen by few receptors in relatively close proximity to it. In this regard, even in the absence of the Gosden Hill Farm allocation, the site could be released from the Green Belt without adversely affecting the Green Belt’s function in the wider context.

3.12 From a landscape perspective, it is EDP’s opinion that there are no ‘in principle’ constraints with regard to future built development of the site. However, in the interests of good masterplanning, attention should be given to the higher ground within the site which can be seen in views from elevated locations with the local context. In addition, the key landscape features (hedgerows and trees) should be retained and enhanced to reduce the site’s geometric structure and mitigate landscape and visual effects, helping to integrate the site into its context.

3.13 CgMS has undertaken an Archaeological Desk Based Assessment which confirms that there are no World Heritage Sites, Registered Historic Parks and Gardens, Historic Battlefield or Wreck sites within a 1km radius of the site. The site is not located in an ‘Area of High Archaeological Potential’ as defined by Guildford Borough Council or a ‘County Site of Archaeological Importance’ as defined by Surrey County Council. Overall the Assessment concludes that if further archaeological assessment is required by the Local Planning Authority, this could be undertaken after the grant of planning consent, secured by an appropriately worded condition. As such there are no archaeological or heritage based constraints associated with the allocation of this land.

3.14 A report has been undertaken by Phil Jones Associates in respect of potential access arrangements and the overall sustainability of the site. A copy of the report is attached at Appendix Two. In summary, the site could be served by its own independent access off the A3 and link to the draft allocation at Gosden Farm in the interests of creating a sustainable and legible form of development.

3.15 The Report also outlines the existing and proposed public transport and highway improvements that could be undertaken to support the draft and extended allocation, as set out in the draft policy. However, it is noteworthy that the draft policy outlines an aspiration to deliver a new link road between the A3/A3100 Burpham junction and the B2215. It is questionable whether this link road is indeed necessary to facilitate the proposed allocation at Gosden Farm, however any land physically required to deliver any improvement should be safeguarded to facilitate its delivery. On this basis my client’s additional land interests should form part of the wider allocation to ensure that the site can be delivered in accordance with the requirements of the NPPF.

3.16 Any planning application would be supported by a Travel Assessment and Travel Plan which would provide further information in this context. There are no overriding highway constraints to the delivery of the site in a logical and sustainable manner.

3.17 In conclusion it is considered that there are no in principle constraints to development of the site. The wider landholdings of Bloor Homes represent a logical opportunity to extend the existing Gosden Hill Farm site for an additional 300 - 400 dwellings and associated SANG. It is considered that the conclusions of the Sustainability Appraisal in respect of the Gosden Hill Farm allocation would equally be applicable to the Nutbourne Farm extension land and would enhance the credentials of the overall allocation. The increased quantum of development would help in addressing the concerns raised regarding the Council’s proposed housing target and the means of delivering this.

4. Conclusion
4.1 These representations have been prepared by Turley on behalf of Bloor Homes Southern in respect of the Guildford Borough Proposed Submission Local Plan (June 2017). The consultation is targeted to the proposed changes to the Plan since the 2016 consultation and the revised evidence base documents.

4.2 Our client has important land interests in the Local Plan area, in particular at Nutbourne Farm – land to the east of Gosden Hill Farm, Guildford. As such this response focuses on issues which particularly affect the site.

4.3 Each of our responses relates to a particular policy or paragraph and this report is structured accordingly. In summary our submissions are:

- **Policy A25** – We strongly support the proposed allocation of the site Gosden Hill Farm site and the recognition of its sustainability to accommodate a large scale extension to the existing settlement.

- **Nutbourne Farm** – we consider the site presents an opportunity to extend the proposed allocation at Gosden Hill Farm and further enhance its sustainability credentials and meet the needs of the Borough, and the needs of adjoining authorities.

[See attachment for Appendices]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- **170717_02896 Land at Gosden Hill Farm Guildford_Site Access Study_Part3.pdf** (4.3 MB)
- **170717_02896 Land at Gosden Hill Farm Guildford_Site Access Study_Part2.pdf** (3.9 MB)
- **170717_02896 Land at Gosden Hill Farm Guildford_Site Access Study_Part1.pdf** (4.7 MB)
- **Turley.pdf** (7.9 MB)

**Comment ID:** pslp171/1512  **Respondent:** 16206593 / Bloor Homes (Rebecca Fenn-Tripp)  **Agent:** Turley (Donna Palmer)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

2.40 The Government has adopted a clear stance of moving away from locally set standards in respect of renewable energy for housing schemes, with such matters instead addressed through the Building Regulations. The NPPG makes clear that additional requirements on technical standards can only be applied with regard to water, accessibility and nationally described space standards. As such we are concerned that the policy is unsound in that it is not consistent with national policy. In addition we have concerns regarding the practicality of implementing certain of the detailed criteria currently proposed as discussed below.

**Sustainable Development**

2.41 Criterion 1b requires the sustainability statement to set out how the development will deliver “the lowest level of carbon emissions (direct and embodied).” Similarly, criterion 1c requires “the highest levels of energy and water efficiency.” As currently it is considered that the proposed policy wording is ineffective.

2.42 No clarity is provided as to what constitutes the lowest or highest levels. For instance, should a new form of emerging technology be able to deliver a lower level of carbon emissions but this is not currently widely available this would seemingly fail the currently proposed policy test. Similarly if there is a form of technology available but this would be
prohibitively expensive and would render the development unviable, this would again fail the proposed policy test. Further clarity and flexibility must therefore be introduced to the proposed policy wording.

**Renewable, low carbon and decentralised energy**

2.43 The policy requires all new developments to “connect to (C)CHP distribution networks where they exist, or incorporate the necessary infrastructure for connection to future networks, unless it can be clearly demonstrated that doing so is not feasible or that utilising a different energy supply would be more sustainable.”

2.44 Clearly (C)CHP is unlikely to be delivered in all locations. The proposed policy wording does provide some flexibility in respect of demonstrating if it is feasible, however this test needs to be applied to the site itself and the wider context. Whilst it may be feasible for the development to provide the necessary infrastructure for connection to future networks, if it can be robustly demonstrated that the location in general is not feasible for a future network to be delivered then this should equally apply. The proposed policy text should be updated to clarify this approach.

**Carbon reduction**

2.45 The policy also seeks to require new buildings to achieve a reduction in carbon emissions of at least 20%. If the principle of this requirement is accepted, we continue to have concerns regarding the potential implications for the viability of developments. Whilst the implications of the proposed increase to 20% have been assessed in the Assessment of the Viability of Carbon Emission Targets for New Builds (April 2017) prepared by Evora Edge, this has not been considered in combination with the other proposed revised policy requirements through an updated viability assessment. The current requirement is therefore considered to be unsound in that it is neither justified nor effective.

**Policy D2** – Further clarity is required to ensure the proposed policy wording is effective. Flexibility should also be introduced into the proposed policy wording.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1505</th>
<th><strong>Respondent:</strong> 16206593 / Bloor Homes (Rebecca Fenn-Tripp)</th>
<th><strong>Agent:</strong> Turley (Donna Palmer)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Accessible Homes**

2.23 The revised policy wording seeks to include the following requirement:

“On residential development sites of 25 homes or more 10% of new homes will be required to meet Building Regulations M4 (2) category 2 standard ‘accessible and adaptable dwellings’ and 5% of new homes will be required to meet Building Regulations M4 (3)(b) category 3 wheelchair user accessible dwellings standard or any subsequent legislation on making homes accessible and adaptable.”
2.24 The NPPG makes clear that it is for LPAs to demonstrate the need for these requirements. It is considered that insufficient evidence has been provided by the Council to justify these requirements. The only justification provided by the Council relates to generic comments from the SHMA and Addendum SHMA regarding the ageing population in the Borough. Based on the currently available evidence it is considered the requirement is unsound.

2.25 Furthermore, whilst the supporting text at paragraph 4.2.10 indicates that there will be a degree of flexibility as to how the requirements are applied, this is not reflected in the policy wording. Whilst the principle of the flexibility is supported, concern is also raised regarding the proposed wording which currently states that the requirement will only be relaxed “where substantial evidence is provided to justify an exception.” Clearly this requirement is inappropriate and is not the correct test to be applied. Flexibility should be allowed where proportionate evidence is provided which clearly justifies an exception. This justification could relate to viability grounds as well as whether a need for the provision to be made on the site can be identified or not.

**Self-build and custom housebuilding**

2.26 The Policy seeks to require the provision of plots for self-build and custom housebuilding by introducing the following requirement:

"Self-build and custom housebuilding will be supported if the proposed development has no adverse effect on the local character. On development sites of 100 homes or more 5% of the total homes shall be available for sale as self-build and custom housebuilding plots whilst there is an identified need. For phased development, self-build plots must be delivered and serviced at the earliest stage possible. Self-build and custom housebuilding plots are encouraged on smaller residential development sites."

2.27 As currently drafted it is unclear whether the requirement to have no adverse effect on the local character relates to the self/custom build element itself or the wider proposals. In any event it is considered that this wording is inappropriate as it seeks to apply a definitive test which does not allow for application of the planning balance. Whilst proposals should seek to have no adverse effect on the local character any harm should be weighed against the benefits of the proposals. Furthermore given the nature of self/custom build, the potential effects on the local character will not be able to be assessed definitively at the point of determination of an application for the wider development site. As currently drafted, concern is raised that the necessary lack of certainty of the effects of these plots may prevent the approval of applications for the wider site if this policy wording is to be rigidly applied.

2.28 The PPG makes clear that the Local Planning Authority must assess the local demand for self-build housing. The PPG advises:

“Plan makers should, therefore, consider surveying local residents, possibly as part of any wider surveys, to assess local housing need for this type of housing, and compile a local list or register of people who want to build their own homes” (ID 2a-020-20140306).

2.29 Whilst the Council’s website provides details of how to apply to be on the register, including details of a recent consultation on revised eligibility criteria, there are no details as to the number of people currently on this register. As such it considered that there is insufficient information to justify the requirement currently proposed.

2.30 Furthermore, whilst we agree that custom and self-build may be appropriate for some schemes, we do not consider that large strategic sites are an appropriate location and are unlikely to be taken up. The policy wording does specify that plots are only required to be made available and marketed for a period of 18 months, before, we assume as this is not explicitly stated in the policy wording, reverting to the developer. It is however considered that this will delay the delivery of the scheme, create uncertainties in the build programme for developers and potentially add additional costs as a result of abortive work.

2.31 Whether or not the percentage requirement of custom/self-build housing is amended, should the Council be minded to retain a requirement for all housing developments of 100 or more dwellings, we consider that the words “subject to viability” should be added to the policy to provide suitable flexibility. It is considered that the requirement for delivery of self and custom build plots at an early stage will add to the potential viability implications given the early delivery of units is generally required in order to fund necessary supporting infrastructure works. Furthermore, as raised above, if these plots
do then revert to the developer due to lack of interest, this would likely lead to additional costs due to changes to the build programme etc.

2.32 It is noted that the supporting text to the policy states that:

"Higher density residential sites for flatted developments are unsuitable for self-build and custom housebuilding plots; they are therefore exempt from the requirement to provide plots."

2.33 The wording of the supporting text is not reflected in the Policy wording itself as currently drafted. Furthermore there is no clarity on the Council’s definition of higher density and how this would be applied to developments which contain a mix of houses and flats.

2.34 As currently drafted this requirement is considered to be unsound in that it is not justified, effective or consistent with national policy.

**Policy H1** – Insufficient evidence has been provided to justify the Council’s proposed requirement in respect of accessible homes.

Concern is raised as to whether the requirements for self-build and custom housebuilding are justified and effective.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1506</th>
<th>Respondent: 16206593 / Bloor Homes (Rebecca Fenn-Tripp)</th>
<th>Agent: Turley (Donna Palmer)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

2.35 The Policy seeks sites of 5 or more homes, or 0.17ha or more, to provide at least 40% affordable housing. There is a significant need for affordable housing in the Borough and this is supported by the Council’s evidence base. A Local Plan and CIL Viability Study (October 2016) has been prepared by Peter Brett Associates on behalf of the Council. The Study concludes that:

"Based on the assessment of the policy requirements within the Guildford Borough Proposed Submission Local Plan (June 2016) review, it is considered that the current Plan would not unduly burden the delivery of residential and non-residential development in Guildford borough."

2.36 No updated assessment has been undertaken to support the current Local Plan consultation and the revised policy requirements. This is considered to be a significant flaw particularly in light of the proposed additional requirements in respect of accessible homes and custom and self-build housing. An updated Study should be commissioned to ensure the proposed policy is justified and effective in light of the revisions proposed to the Local Plan under the current consultation.

2.37 In addition, it is considered that flexibility should be introduced to the proposed policy wording to allow for site specific circumstances where the proposals may be rendered unviable by the level of affordable housing sought. This is
particularly likely to be the case where there are non-standard infrastructure requirements to support the development or potential contamination on site. The policy wording should therefore be updated to require provision of at least 40% affordable housing, subject to viability. It is noted that such a mechanism is advocated in paragraph 4.2.40 of the supporting text but not reflected in the policy wording itself.

**Policy H2** – The proposed affordable housing requirement is not underpinned by a robust and up to date viability assessment and as such is considered to be unjustified.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1500  **Respondent:** 16206593 / Bloor Homes (Rebecca Fenn-Tripp)  **Agent:** Turley (Donna Palmer)

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Introduction**

1.1 These representations have been prepared by Turley on behalf of Bloor Homes Southern in respect of the Guildford Borough Proposed Submission Local Plan (June 2017). The consultation is targeted to the proposed changes to the Plan since the 2016 consultation and the revised evidence base documents.

1.2 Our client has important land interests in the Local Plan area, in particular at Nutbourne Farm. This lies to the east of Gosden Hill Farm, Guildford and falls partly within draft Policy A25 within the submission Local Plan for c. 2000 homes, employment, retail and a school. A Site Location Plan identifying the site is provided at Appendix One. As such this response focuses on issues which particularly affect the site.

1.3 Each of our responses relates to a particular policy or paragraph and this report is structured accordingly.

**Policy S2: Planning for the borough – our spatial development strategy**

**Housing Requirement**

2.1 The current consultation version of the Local Plan proposes a new plan period of 2015 to 2034 and a reduced housing requirement of 12,426 (654 dwellings per annum). This represents a reduction of 1,434 dwellings compared to the previous consultation version of the Local Plan.

2.2 The West Surrey Strategic Housing Market Assessment was published in September 2015 and covered the authorities of Guildford, Waverley and Woking. This identified an annual requirement of 693 dwellings in Guildford, with 519 and 517 dwellings per annum for Waverley and Woking respectively. Clearly therefore the Council’s now proposed housing requirement falls short of the OAN for the Borough as established in the 2015 SHMA.
2.3 The Council have subsequently commissioned an Addendum Report to the SHMA (March 2017) in relation to Guildford Borough in isolation. The Addendum Report identifies an OAN for the Borough of 654 dwellings per annum and it is on the basis of this figure that the Local Plan has been prepared.

2.4 It is notable that West Oxfordshire District Council has recently sought to take a similar approach in its Local Plan Examination. The District Council independently prepared an update to the Oxfordshire SHMA on its OAN in isolation and sought to proceed on the basis of the reduced figure contained therein. This approach was not accepted by the Inspector as being sound and resulted in a lengthy suspension to the Examination to allow the Council sufficient time to undertake the necessary work to address meeting the higher OAN figure advocated in the County wide SHMA. Although the Examination has now resumed, this has resulted in over a twelve month delay in the process.

2.5 As such, given the recent experience of West Oxfordshire, it is considered that the Council’s current approach represents a significant risk to the soundness of the Plan.

2.6 The 2017 addendum to the SHMA indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa. Whilst economic factors are an important consideration it is important that these are considered at a wider scale than an individual local authority level, as had been done under the previous SHMA but is not the case in the recent addendum. In addition it is noted that the demographic baseline and affordability issues suggest an increase in OAN. As such it is considered the 2017 addendum to the SHMA is an inappropriate basis on which to plan.

2.7 Paragraph 2.4 of the SHMA addendum notes that there are significant affordability issues in the HMA. In this regard we note that the evidence indicates that these affordability issues are worsening (the 2017 addendum indicates that the affordable housing need has risen from 517 dpa to 552 dpa). We understand that the Council has retained the approach to applying an affordability uplift in the 2017 addendum that was used in the 2015 SHMA. Furthermore, we understand that this limits the uplift to one related to an adjustment to the household formation rates of younger households. We understand that this results in a 9% upward adjustment to the ‘starting point’ household projection. Given the existing and worsening affordability issues in the Borough, we consider that it is unreasonable to limit this uplift to 9%. In fact, we note that in the adjoining borough of Waverley, the Local Plan Part 1 Inspector has applied an uplift of 25%.

2.8 At this stage, given the Council is failing to meet its own full OAN as calculated in the 2015 SHMA, the Council is also making no provision to meet the unmet needs of any adjoining authorities. In particular Woking’s Core Strategy (2012) sets out its housing requirement as 292 dpa, some 225 dpa below the OAN as established in the 2015 West Surrey SHMA.

2.9 Notably this issue has been specifically considered by the Inspector at the recent Waverley Local Plan EIP hearing sessions. During these hearings, the Inspector clearly indicated that he considered it appropriate for Waverley and Guildford to accommodate the unmet need from Woking. From our involvement in the Waverley Local Plan sessions it is expected that Waverley will be required to accommodate at least 50% of the unmet need from Woking, which amounts to 83 dpa.

2.10 Looking more widely it is also important to recognise the relationship the Borough has with London and the unmet needs associated with it. The Inspector’s Report for the Local Plan found that the Greater London Authorities could not meet its objectively assessed need of 52,000 dpa, nor its target of 49,000 dpa, as it has an identified capacity of 42,000 dpa only.

2.11 If the reduced OAN for Guildford itself can be justified through the SHMA addendum (although as discussed we have concerns regarding the soundness of this approach) then consideration should have been given in any event to the ability of the Borough to meet the unmet needs of adjoining authorities, in particular Woking. It is apparent that this approach has not been followed.

2.12 Paragraph 4.1.9a of the Local Plan states:

“The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”
2.13 Clearly therefore there is no justification to restrict the housing requirement on the basis of housing supply. As such it is considered the Plan should make provision for its full OAN and explore its ability to accommodate the needs of adjoining authorities. Additional allocations should be made to meet this requirement. At the current time the plan is considered to be unsound in that it is not justified, effective, positively prepared or consistent with national policy.

The phasing of development as set out in the Annual Housing Target table

2.14 We note from the Annual Housing Target table contained within Policy S2 of the Guildford Borough Proposed Submission Local Plan that the housing requirement is to vary annually from 450 dwellings per annum upon adoption, rising to 850 homes per annum at the end of the Plan period. Paragraph 4.1.9a of the Proposed Submission Local Plan seeks to justify this approach on the basis of the likely rate of delivery, particularly on the strategic greenfield sites. In addition paragraph 4.1.9b of the Proposed Submission Local Plan explains that this “phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy.” Notwithstanding our specific concerns about this table (set out below), the Council’s approach to phasing raises a number of concerns.

2.15 The effect of the Council’s approach in this regard results in a situation where there is likely to be a shortfall in delivery of 204 dwellings per annum in the period from 2019 when compared to the objectively assessed need highlighted in the SHMA. This will lead to a situation whereby those in need of housing, in particular affordable housing, may not be able to access accommodation in the Borough until later in the Plan period. Indeed, given the undersupply which has already taken place, this situation has already been occurring and would be further exacerbated by the proposed approach taken in the Local Plan. In such circumstance a proportion of the population may therefore be forced to find accommodation elsewhere and this approach could result in a situation which undermines aspirations for job and economic growth within the Borough as a result of a lack of available workforce for example. We are also concerned that the Council’s phased approach seeks higher delivery rates later in the plan period. Given that the emerging Local Plan is predicated on a number of large sites, there is a significant risk that if these do not come forward at the rate envisaged then there will be less time available to remedy any shortfalls.

2.16 The Housing Topic Paper (which accompanies the emerging Local Plan) acknowledges that housing delivery is a major issue for the Borough. However, paragraph 47 of the NPPF requires Local Planning Authorities to ‘boost significantly the supply of housing’ and the National Planning Practice Guidance states that they must ‘deal with undersupply within the first five years of the plan period where possible’. Guildford Borough Council has deemed this to not be possible within the Borough. The Council identifies that there will be an overall unmet need of 3,150 homes in the period (2013/2014 – 2-236/2027). Far from dealing with an undersupply in the first five years of the Plan period, the Council’s approach seeks to delay the delivery of a significant proportion of the housing requirement. Consequentially this raises concerns over whether any accrued shortfalls can be resolved.

2.17 If the Council considers that housing delivery is a major issue within the Borough, then a greater range, scale and type of sites should be identified in order to aid delivery rates.

2.18 Furthermore the paper identifies housing delivery within the first five years of the emerging Local Plan period as another major issue. The paper states that a significant shortfall in sustainable sites remains, when taking account of the deficit accrued since 2015 and the 20% buffer; the buffer applied as a result of the persistent under delivery of housing in line with Paragraph 47 of the NPPF. The Council states that this will be resolved in the later periods of the Local Plan, in line with expected infrastructure delivery and through the development of strategic sites.

2.19 The Land Availability Assessment June 2017 Addendum details the Council’s most up to date housing land supply position. The five year housing land supply position for 2016/2017 (which covers the monitoring period 1st April to 31st March 2018) is said to be 2.36 years based on the Council’s evidence, demonstrating a significant and severe deficit in housing supply. We consider that this position demonstrates the clear need to ensure that all available opportunities to identify sites to help meet the housing requirements in the Borough (including unmet needs arising within the wider Housing Market Area if necessary) are considered. The approach (explained in the previous paragraph) which arbitrarily restricts the availability of sites is fundamentally flawed.

2.20 Paragraph 4.1.9a of the Proposed Submission Local Plan states that the figures in the Annual Housing Target table (contained in Policy S2) “sum to a total of 12,426 dwellings.” We calculate that the figures sum to a total of 9,810...
dwellings. It appears as though if the figure of 12,426 is achieved then the period covered by the Annual Housing Target table should be expanded to cover the four years from 2015/16 to 2019/20. It is not clear why that part of the Plan period has been excluded from the table.

2.21 We note that paragraph 4.1.9a of the Proposed Submission Local Plan states:

“This [the figure of 12,426] is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

2.22 We consider that the Proposed Submission Local Plan does not include this flexibility despite the claim at paragraph 4.1.9a.

**Policy S2** – The Council should endeavour to meet its full OAN and seek to assist in meeting the needs of adjoining authorities, in particular Waverley Borough Council, where possible. Further allocations should be made to provide flexibility in the delivery of the Plan and to meet the required increased housing requirement.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A23: Land North of Salt Box Road, Guildford
This site is within 400m of the Thames Basin Heaths SPA and whilst allocated for a new burial ground, potential impacts on the SPA must still be considered especially given that a new car park and site access is proposed. We would expect measures to be put in place to ensure that the car park is not available to the general public.

The site and the car park must not link to the Public Rights of Way which lead towards the SPA.

This site allocation is in very close proximity to the Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1291  Respondent: 16209409 / Natural England (Amy Steel)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A24: Slyfield Area Regeneration Project, Guildford
This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1292  Respondent: 16209409 / Natural England (Amy Steel)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A25: Gosden Hill Farm, Merrow Lane, Guildford
This site includes an area of Registered Common Land. This is covered by the Commons Act 2006 and will have rights of access by the public which must be considered in the proposed use of the site and may also affect the capacity of the proposed SANG area. Guidance on common land is available at https://www.gov.uk/guidance/carrying-out-works-on-common-land. In particular we draw your attention to the Secretary of State’s policy for casework related to common land and town or village greens in England and the requirement, in the case of deregistration of common land, for the provision of replacement land. Natural England is a specified consultee under the Commons Act 2006 and will respond to any consultations in line with the above guidance.

This site is adjacent to and includes ancient woodland within the site. Any direct or indirect impacts on this site should be avoided or mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1293</th>
<th>Respondent: 16209409 / Natural England (Amy Steel)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A26: Blackwell Farm, Hogs Back, Guildford
This site is within the setting of the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1294</th>
<th>Respondent: 16209409 / Natural England (Amy Steel)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A27</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A27: Warren Farm, White Lane, Ash Green
This site is within close proximity to the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

This site is adjacent to ancient woodland. Any direct or indirect impacts on this site should be avoided or mitigated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: pslp172/1295  Respondent: 16209409 / Natural England (Amy Steel)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Policy A29: Land to the south and east of Ash and Tongham
This site is in very close proximity to the Thames Basin Heaths SPA and therefore must provide an appropriate suite of mitigation to ensure that impacts upon the site are avoided. This is likely to include provision of SANG above the minimum standard of 8 ha per 1,000 persons.

This site allocation is in very close proximity to Thursley, Ash, Pirbright and Chobham SAC and Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: pslp172/1296  Respondent: 16209409 / Natural England (Amy Steel)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A33

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A32: Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford
Policy A33: The University of Law, Guildford

These sites are within the Surrey Hills Area of Outstanding Natural Beauty. We advise the LPA to take into account the relevant Management Plan for the area and should seek the views of the AONB Partnership. Development proposals brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan’s area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

These sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3533  Respondent: 16209409 / Natural England (Amy Steel)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy ID4: Green and Blue Infrastructure
We would recommend that in point (1) the word maintain is added to accompany conserve and enhance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy ID4: Green and Blue Infrastructure
We would recommend that in point (1) the word maintain is added to accompany conserve and enhance.

Attached documents:

Comment ID: pslp171/310  Respondent: 16209409 / Natural England (Amy Steel)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A39: Land near Horsley railway station, Ockham Road North, East Horsley
Policy A43: Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley
Policy A58: Land around Burnt Common warehouse, London Road, Send

These sites are adjacent to ancient woodland. The policies should ensure that any direct or indirect impacts on these sites are avoided or mitigated.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/309</th>
<th>Respondent: 16209409 / Natural England (Amy Steel)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Policy P5: Thames Basin Heaths Special Protection Area

We advise that under point (3) a separate point should be included to state that the amount of SANG land needed can also depend on the size, scale and proximity of the development to the SPA as well as the number of expected occupants. The 8ha per 1,000 people standard is only the minimum that could be required.

Natural England disagrees with paragraph 4.3.51 which should be revised. Natural England advise that there is potential for developments under the use class C2 to have a significant impact upon the SPA even if they are not for staff. The main consideration for applications, particularly those including care facilities (in either use class C2 or C3), is the mobility of the residents and therefore the risk that the residents could recreate on the SPA, causing a likely significant effect on the integrity of the site. C1 accommodation could also have a significant effect on the SPA depending on the length of time that people could stay at the facility and whether it could be a person’s fixed address e.g. ‘apart-hotels’. C1 and C2 applications should be assessed on a case by case basis in consultation with Natural England.

The end of paragraph 4.3.54 should include that these developments will be assessed on a case by case basis and agreed with Natural England.

Paragraph 4.3.62 should be revised to state that SAMM contributions are held by Hampshire County Council and that Natural England only act as a host to the project.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/656</th>
<th>Respondent: 16209409 / Natural England (Amy Steel)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Habitats Regulations Assessment
Having read through the updated document to take into account chapter 12, Natural England supports the overall conclusions of the assessment and can advise that the evidence used, particularly relating to Air Pollution is entirely appropriate.

We have however had a conversation with Guildford Borough Council during this consultation period to discuss the readability of certain sections within the document. Natural England expects Guildford Borough Council to amend these sections before submission to the inspector which we would be happy to provide further comments on. Despite this, it is important to note that this will not alter the overall conclusions of the assessment which as stated above we are supportive of.

Please see attached Annex A for our advice.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 217709_Guildford_Local_Plan_Strategy_and_Sites.pdf (175 KB)

Comment ID: pslp172/2396  Respondent: 16866849 / Alison Legg  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to raise 2 points that I feel most strongly about to the amended Guildford local Plan Consultation 2017

Although a revised number of new homes have now been identified for Guildford, numbers are based on assumptions and calculations have not made publicly available. These numbers have not been obtained through any kind of independent report and so are inherently inaccurate.

With regard specifically to the proposed development (A 25) at Gosden Hill Fam, Guildford, using existing roadways and traffic junctions is unsustainable. The nearby roads are often congested and at a standstill on a very regular basis.

In the Guildford Borough Transport Strategy 2017 document, several references are made as to ‘Aspirations to the A3 Guildford Tunnel’. Unfortunately this document is not included in the Guildford Local Plan. Surely the Guildford Borough Transport Strategy and Local Plan should be considered concurrently? The tunnel proposal should be thoroughly investigated, planned and included in the Local Plan as this would save a great deal of money in the long term. Otherwise Guildford will find itself either unable to build this tunnel and Guildford could become a ‘no go’ area for many due to the congestion getting into, out of, or through Guildford. Alternatively Guildford will find itself in a similar situation to Sheffield and the HS2 train route where people living in newly constructed properties face having their homes demolished to make way for infrastructure.

I also support Burpham Community Associations representation to you.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2  Respondent: 17069697 / Francesca Pacitti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Are we confident that Ash is able to absorb 1750 new homes, in terms of school places and road infrastructure? The expansion of secondary school places at Ash Manor is welcome, but what will be done to ensure sufficient primary school places and availability of secondary places beyond Ash, for parents who prefer to send their children elsewhere? What will be done to alleviate the morning gridlock on Ash Street?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Add requirements
- to support expansion of primary school places and of secondary school places beyond Ash
- to alleviate traffic on Ash street/A323 at rush hour, including appropriate parking for school drop off at both Ash Manor School and Walsh Junior School
- to increase parking at Ash railway station
- to build footpath along Foreman road to enable safe walking from Ash Green to Ash station

Attached documents:

Comment ID: pslp173/2  Respondent: 17070913 / Green Reach Limited (Matthew Estwick)  Agent: Obsidian Strategic (Philip Scott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We approve of the changes to the wording for SANG8 Land Adjacent to Long Reach, West Horsley. This SANG should be retained in the PSLP. SANG8 is a strategic SANG proposal which is supported by Natural England and it will deliver significant net benefits towards habitat creation and biodiversity. The HRA supporting the PSLP makes it clear that the proposed housing strategy can only be delivered if the identified SANGs are brought forward in those locations proposed in the PSLP.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp17q/1  Respondent: 17070913 / Green Reach Limited (Matthew Estwick)  Agent: Obsidian Strategic (Philip Scott)


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We consider that the PSLP is sound providing that proposed housing in the Horsleys and other location impacted by the Thames Basin Heaths Special Protection area is adequately mitigated through the provision of additional SANG land (as evidenced in the Habitats Regulations Assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/3  Respondent: 17100705 / Sylvia Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Given three forecasts as cited in Guildford Borough Land Availability Assessment(LAA) Feb 2016 of the new local plan, has sufficient focus been given to their overall impact on its efficacy? eg Patterns of Retail, Leisure Spend a) p101, 9.7 That capacity forecasts beyond 5 years should be treated with caution(and growth in the internet is one factor given)b) p102, 9.11 Notwithstanding Guildford’s positive performance as noted increased competition from other major centres(eg Kingston) as well as, again, online shopping competition is cause for concern c) p105, 9.27 The impact of large retail development, eg North Street circa 47,500m squared on footfall and trade patterns across the town centre is another troubling factor.(And I cite here TunsGate development in the High Street)

In Appendix B, Realistic Candidates for development of the LAA(February 2016), 178, Guildford Park Car Park(160 houses) is up for development but according to the June 2017 Addendum, this has now been deleted.

In p6, Policy E7 Guildford Town Centre of the summary of key changes to the proposed submission Local Plan: Strategy & Sites(2017) it is stated ‘Deletion of the Vision which came from the Town Centre Masterplan.’ Does this mean the River Wey as a whole is no longer to be developed? If not, it is not clear what are the plans(if any) for this large area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5209  Respondent: 17111233 / Tony Wales  Agent:
Having seen the proposed changes to the Proposed Submission Local Plan, I am seriously concerned about the proposals around Burnt Common (plan 43).

From a transport viewpoint, the proposal to install a new exit ramp from the A3 at Burnt Common seems to be ill-thought out and counter-productive. I appreciate the need to relieve the volume of traffic through Ripley, but by adding a new exit from the A3 at Burnt Common, it will merely transfer the problem to the A247 and the villages of West Clandon, Send and surrounding areas. In particular, this will encourage traffic to use a ‘rat run’ through these villages to the southern areas of Guildford.

Please note the following important points:

1. The A247 is not a wide road and becomes exceptionally narrow as it passes through the West Clandon Conservation Area, where two large vehicles (lorries, buses) cannot easily pass each other.
2. There is no prospect of widening the A247 at this point as there are conservation properties close to the road boundary on both sides.
3. There is already limited access for pedestrians with a single, narrow pavement and any increased volume of traffic is likely to increase the risks for pedestrians.
4. West Clandon is a ‘ribbon village’ which is laid out along the path of the A247 as it becomes The Street. There is no village square or centre. Any increase in traffic along The Street would have a seriously detrimental impact on the life of the village, which would become dissected by an increasingly busy, major road.
5. There would be no benefit to the local residents of this area, as it merely gives greater access to through traffic at a serious cost to the detriment of the local area.

From a housing viewpoint, the Burnt Common proposals to create 1,700 new dwellings seem similarly ill-thought out. There is no infrastructure to support such a large development. Please note the following points:

1. There is an extremely limited bus service and the nearest rail station (Clandon) would be a 30 minutes’ walk. This would mean that the new residents would be forced to rely on car transport, thereby adding a severe load to the local roads which are already becoming congested.
2. There are no local shops and limited availability of schools in the area.
3. The proposals would merely create an isolated housing estate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/9  Respondent: 17130497 / Ripley Court School (Andrew Gough)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The evidence base for this consultation is vastly complicated. One has to assume that it is all relevant and legal although this is far from clear. However, I cannot see how air quality and road traffic movement can improve with these huge changes to the green belt in this area.

For example, paragraph 1.1.5 excludes car access to facilities or the impact on public transport. Although this is included in the overall transport strategy, little assessment seems to have been made of the massive traffic delays on the A3 in recent years due entirely to weight of traffic. Access to the A3 and motorway network by the owners of another 400+ houses, assorted travellers and industrial traffic can hardly improve this. The Topic paper on transport speaks fine words about effective and safe travel, but seems more of an attempt to justify a huge increase in traffic and noise and air pollution which simply would not happen without these incursions into the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/12  Respondent: 17130497 / Ripley Court School (Andrew Gough)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I am objecting to changes in the plan as follows:

The site A43 Garlicks Arch would constitute a massive incursion on greenbelt land, made even worse by the increase to 400+ houses and would be extremely harmful or indeed destroy the nature of the rural villages of Ripley, Ockham and Send, causing them to coalesce into a conurbation.

The inclusion of 6 industrial sites/plots for storage of heavy machinery associated with travelling show people is entirely inappropriate. There is no indication of a need within the local plan or a need historically in the local area. Moreover, the scale of such a site would be indicated by a development of up to 1999 homes, which this plan does not propose.

The development of an industrial area gives no indication of the industries referred to (on the site A58 at Burnt Common). This is clearly a speculative plan to change the greenbelt into an industrial area and little detail is given for the justification for this, meaning it cannot be considered to be covered by a full consultation.

In addition, a Waste Management site is partially concealed within the A58 Burnt Common site in policy 4.4.23a and no proper consultation is indicated here either.

There is an increase of house numbers from 45 to 60 in an already unwelcome development at Tannery Lane, which will inevitably cause even more congestion in a sensitive and congested transport network around Ripley.

Overall, this Local Plan as suggested for Ripley and surrounds constitutes a grandiose and unwelcome development which impacts severely on a rural area, and these changes make it worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/80  Respondent: 17133121 / Catherine Rose  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, Send which will have a significant impact on the already highly congested local rural road network around and within Ripley. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

- I object to the fact that this is even a consideration. Has anybody from the Council driven through these areas, specifically in rush hour time?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the fact that you are going to ruin beautiful parts of Surrey with your plans. These areas are beautiful spots in Surrey away from the noise and bustle of the nearby towns. Common sense must prevail here, surely?

-I object to any development on Site A43 at Garlicks Arch as this would be on Green Belt Land - there is nothing identified or exception in the Local Plan documentation.

-I object to including 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Green Belt and there is no identified need within the Local Plan.

-I object further to the allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. The Plan itself has huge discrepancies and is therefore not properly constituted.

-I object to the potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. The plan states that “if the [Traveller sites] remains unsold, the future use of the land should have regard to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with specific consideration of the use of the land for affordable housing”. So the creation of even more travellers pitches and houses, which you are yet to justify.

-I object to Section 4.2.22 of the Plan which states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Travelling Showpeople” So why on earth would you put 75% of them in Ripley? This is ridiculously unbalanced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the fact that a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a and does not allow for full and proper consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/90  Respondent: 17133857 / Joe Tombolson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/92  Respondent: 17133985 / Sarah Brabner Evans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/93  Respondent: 17134113 / Ann Pauline Meek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/95  Respondent: 17134177 / Roy Leonard Farley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/98  Respondent: 17134369 / Grace Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/99  Respondent: 17134433 / Janet Mary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/128  Respondent: 17138721 / C J Collin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Comment ID: pslp172/141  Respondent: 17139553 / Alan Unwin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/145  Respondent: 17139649 / Roy Sills  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/157  Respondent: 17140321 / Kim Evans  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (Policy A26 & para. 4.1.9), which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8].
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas.
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a].
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/162  Respondent: 17142273 / S. Woodgate  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4884  Respondent: 17142273 / S. Woodgate  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/205  Respondent: 17143809 / Katie Slatford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/201  Respondent: 17143841 / Michael Riddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/196  Respondent: 17143937 / Chris Sturdee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/195  Respondent: 17144001 / Helen & John Munday  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/193   Respondent: 17144225 / B. Hall   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/191   Respondent: 17144385 / Valerie Parsons   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/189  Respondent: 17144417 / C. Riddy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/192  Respondent: 17144449 / Gladis Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/204  Respondent: 17144545 / J. Grist  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/11  Respondent: 17148161 / Sally Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposal to inset Send Business Park from the Green Belt because:

• Development or further expansion at this location detracts from the openness of the green belt, and this is highly inappropriate
• Tannery Lane in both directions has severely restricted vehicular access
• It is in effect and old non-confirming user, adjacent to the beautiful Wey navigation, in an area of outstanding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/242  Respondent: 17148161 / Sally Hall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish object to the Policy A42 change at Clockbarn in Tannery Lane because:

• There is an increase from 45 homes to 60 homes which is more than a 33% increase in plan
• There are currently access and traffic problems in Tannery Lane and at the A247 junction and this plan will only exacerbate all the issues
• River Wey Navigation open countryside views will be impacted
• Obviously there will be further erosion of the Green Belt, and that will make it worse for the village
• Current water surface flooding is already bad and this plan will make it worse
• You have blatantly ignored the previous objections made by local peoples which run into hundreds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/243  Respondent: 17148161 / Sally Hall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1866

Page 1866 of 2988
I wish to object to the Policy A43 change Land at Garlick’s Arch, Send Marsh because:

- There is no proven demand for any travelling showpeople slots in this location
- It will generate excessive traffic further blocking the local roads of Send and Ripley
- Again this area is subject to frequent flooding, being in a flood zone 2 allocation
- It seems once again to ignore the thousands of previous objections made by local residents
- This area has been contaminated by over 50 years of lead shot accumulation
- It is an obvious overdevelopment of the village and in addition the number of homes (400) is excessive
- This is a permanent Green Belt area and no ‘exceptional circumstances’ exist for this beautiful area
- This is an area of ancient woodland which existed in the time of Elizabeth 1, and it is exceptional
- This will cause a ‘joining up’ of Send and Ripley, which defeats the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/244  Respondent: 17148161 / Sally Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to Policy A58 at Burnt Common because;

- Slyfield Green and Guildford still have empty sites and industrial units, therefore there is no need to build industrial or warehouse development in the middle of the green belt
- This was deleted from the 2014 draft due to all the objections made previously.
- The surrounding roads will become swiftly gridlocked as an immediate impact on the smaller roads
- Again the effect of joining up existing roads defeats the purpose of the Green Belt
- The wording has been changed from the previous ‘maximum’ to the word ‘minimum’ in the 2016 plan, however since 2016 there has been a decline in demand for industrial land
- The 2017 Employment Land Need Assessment shows a reduction in demand to just 3.9 hectares for industrial lane for the whole borough, not a massive over allocation of 10 hectares at Send in a dedicated Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/251  Respondent: 17151425 / Sarah Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:  pslp172/265</th>
<th>Respondent: 17151521 / Paul Rhodes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:  pslp172/261</th>
<th>Respondent: 17151585 / Geoff Burch</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/263</th>
<th>Respondent: 17151617 / Suzanne Cummings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/252</th>
<th>Respondent: 17151649 / Susan Gatford</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/262  Respondent:  17151713 / Mr & Mrs M Dear  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/260  Respondent:  17151745 / Gillian Harrold  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/259  Respondent: 17151809 / William Kenneth Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/258  Respondent: 17151841 / Susan Lesley Carr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/257  Respondent: 17151873 / Sally Horan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/254  Respondent: 17151905 / Hannah Lane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/253   Respondent:  17151937 / M Stannard  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/269   Respondent:  17151937 / M Stannard  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/256</th>
<th>Respondent:</th>
<th>17151969 / Jane Marsden</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
<td>( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/273</th>
<th>Respondent:</th>
<th>17153633 / Martin Dowland</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Introduction</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( Yes ), is Sound?</td>
<td>( No ), is Legally Compliant?</td>
<td>( No )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
A26 should be removed. This is not compliant with the intentions set out in P1-5;

The accurate SHMA assessment, recently identified and presented by GRA should be applied which will greatly reduce housing figures;

The Council has not convincingly responded to or reacted to vast public objections.

The strategy for the development of the University of Surrey is based on the assumption that it must develop all of its facilities in Guildford rather than share across Surrey.

The site A26 is in the proximity of the Surrey Hills, the significance of which is not being addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Review of all sites threatened with development in view of the corrected SHMA figure presented by the GRA,

**Attached documents:**

---

**Comment ID:** pslp173/16  **Respondent:** 17156321 / Blackonyx Developments (Philip Scott)  **Agent:** Obsidian Strategic (Philip Scott)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

SANG 8 Land at Long Reach is absolutely vital to release land and deliver housing in the Horsley and Send. It should be allocated in the Local Plan.

SANG1 Effingham Common should be allocated in the Local Plan but is not deliverable as strategic SANG being limited to 400 metres of mitigation. SANG8 is therefore vital to the deliverability of the Local Plan and is supported by the Habitats Regulations Assessment (HRA).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

None. SANG8 Land at Long Reach should be allocated in the new Local Plan.

**Attached documents:**

---

**Comment ID:** pslp172/1583  **Respondent:** 17156321 / Blackonyx Developments (Philip Scott)  **Agent:** Obsidian Strategic (Philip Scott)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? (No), is Legally Compliant? ( )
The draft list of housing sites is too heavily weighted towards major strategic housing sites which will not be delivered in the front end of the Local Plan period. Such an approach will exacerbate the acute need for housing in the borough which is already failing to keep pace with need and failing to deliver a 5 year housing land supply. Indeed, not only is the council moving into the Examination with a 3.2 year housing land supply (this represents a serious housing land deficit) but the Council is also proposing a further accumulated shortfall of 1000 units against its annualised housing target until the draft allocated major housing sites come on stream from 2026.

Despite this context, smaller sites which could deliver housing are either being omitted from the draft Local Plan or are being removed from previous draft iterations of the Local Plan. For example brownfield sites such as Tyrrell site adjacent Long Reach, West Horsley have been identified in the Council's housing evidence base as being suitable to deliver new housing. Tyrrell is a former factory site which is now inefficient and its buildings are in need of major repair and investment. Its rural location also means that attracting investment would lead to greater numbers of HGVs and service vehicles and more noise and disturbance. Planning officers have previously acknowledged that the site is suitable to accommodate new housing development (there is already a residential house on-site in addition to the old factory and storage units and the consented additional B8 building which has already been commenced as in therefore 'live').

However, the Council's housing strategy has omitted this brownfield site when it could help the Council's housing strategy and (with other sites) alleviate pressure on the need for greenfield and undeveloped Green Belt sites.

Such an approach would also be entirely compatible with the Council's 'brownfield first' approach to housing land delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The draft list of housing sites identified under 'Previously Developed Land in the Green Belt' should include the Tyrrell site, Long Reach, West Horsley as being appropriate for redevelopment subject to design and other planning policy considerations.

Attached documents:

Comment ID: pslp17q/144  Respondent: 17156321 / Blackonyx Developments (Philip Scott)  Agent: Obsidian Strategic (Philip Scott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

We consider that there has been insufficient cooperation and consultation with neighbouring authorities in relation to the housing strategy, the OAN, and land supply factors.

In particular, we cannot see sufficient evidence to conclude that the Borough Council has taken on unmet need from Waverley or Woking. Furthermore, in respect of the Housing Addendum carried out in 2017 this data appears to relate only the Guildford borough rather than the West Surrey SHMA area. Further explanation on this main matter is provided in the attached representations.
We have already set out our concerns regarding the Council’s duty to cooperate in our representation to Proposed Submission Policy S2: Borough Wide Strategy and specifically GBC’s approach to re-assessing housing need in isolation from neighbouring borough and districts. In addition, we are mindful that GBC’s duty to cooperate was questioned as part submissions made to the Waverley Borough Local Plan Examination in July 2017. During the Waverley examination, the appointed Inspector (Mr Jonathan Bore) questioned GBC’s representatives who were in attendance at the Examination. The Waverley Local Plan Examination Inspector was very keen to understand why Guildford Borough Council does not appear to have identified land or taken on unmet housing need from neighbouring boroughs in its emerging Local Plan. GBC’s response at the Waverley Local Plan Examination was, in effect, to say that Guildford borough was highly constrained and the ability therefore to take unmet housing need from neighbouring authorities was not possible. This approach, should it be carried forward into the Guildford Local Plan Examination, is simple not adequate.

Firstly, all local authorities forming part of the West Surrey SHMA (and several authorities beyond this area) have constraints whether those constraints include metropolitan Green Belt, AONB, AGLV, Thames Basin Heaths SPA etc. The fact remains that GBC has not only failed to take account of neighbouring unmet need, it has actively and significantly:

- Reduced its Objectively Assessed Need (OAN) against the current of acute housing need.
- Reduced its proposed housing land supply despite historic and current under-performance of housing delivery, and;
- Discounted smaller housing sites which are well placed to meet the needs of neighbouring authorities and communities, despite weighting the reduced housing delivery to the back end of the Plan period.

We strongly maintain that the settlement of Farncombe (with its shared boundary with GBC) represents a suitable, sustainable and accessible opportunity to help accommodate the unmet housing needs of both authorities in just the way that the duty to cooperate is designed to facilitate. Land South of New Pond Road (site No. 80) is ideally placed to assist Guildford Borough Council meet its housing land supply target whilst also helping to meet the acute needs of communities that share a border with Waverley borough in a geographic area which is well served by a range of existing services and amenities including a railway station which links Farncombe to Guildford (just 6 minutes travel time) and which is served by established bus routes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Pond Farm_Draft Regulation 19 Reps.docx (1.2 MB)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp173/21  **Respondent:** 17158849 / Gwenda Wakefield  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the Wey Navigation.
- There is highly restricted vehicular access along Tanner Lane in both directions.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/290  **Respondent:** 17158849 / Gwenda Wakefield  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- 33% increase 45 homes to 60 is too much.
- It creates traffic problems in Tannery Lane and at the A247 junction.
- Loss of Green Belt to our village.
- Creates more surface water flooding.
- Loss of countryside views from the River Wey Navigation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/291  **Respondent:** 17158849 / Gwenda Wakefield  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to Policy A43 change at Garlick’s Arch because:

- It is Green Belt and no exceptional circumstances exist.
- It is ancient woodland that has existed for 100’s of years.
- The number of homes is excessive and will cause over development of our village.
- It defeats the key purpose of Green Belt by joining Ripley and Send.
- The additional traffic created will block up our local roads.
- There is no demand for Travelling plots at this location.
- I believe the site is contaminated by lead shot and is currently in a flood zone.
- It also ignores all the thousands of previous objections made by us, the local people.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/292  **Respondent:** 17158849 / Gwenda Wakefield  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I object to Policy A58 at Burnt Common because:

Slyfield and Guildford have empty sites and industrial units therefore there is no need to build industrial or warehouses development in our Green Belt.

The word minimum is a change from the previous word maximum in the 2016 plan and since then there has been less demand for industrial land.

It is shown in the 2017 Employment Land Need Assessment a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

It defeats the key purpose of Green Belt by joining Ripley and Send.

The additional traffic created will block up our local roads.

Due to all the previous objections it was deleted form the 2014 draft.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/299  Respondent: 17159393 / Colin Sweby  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn, Tannery Lane Send because :-

- The 33% INCREASE from 45 to 60 homes is not acceptable because there is insufficient space in the site unless the Council is happy to build slums of the future!
- All previous objections regaring this development have been ignored
- The infrastructure, particularly the width of Tannery Lane, cannot accommodate the increased traffic generated by this scheme and Send Business Park. Hence there is a risk of traffic accidents within Tannary Lane and it junction with the A247 which has poor sight lines.
- The increase in effluent requiring treatment at Ripley Sewerage works, together with other proposed schemes could result in difficulties in confirming with the Water Framework Directive in relation to the discharge of treated effluent into the river Wey/Wey Navigation canal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/400  Respondent: 17159393 / Colin Sweby  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy change at Garlick’s Arch, Send Marsh, Policy A43 because:

- It ignores the many previous objections to this scheme made by local residents. There is no demand in the hinterland of Send village for accommodation for "Travelling Showpeople"
- The site includes ancient woodland which acts as an environmental buffer between the A3 Ripley Bye-pass and the local properties. What research/desk studies have been completed to identify the flora and fauna which is present and would be irrevocably lost by approving this development.
- Ripley & Send would join into a ribbon development which is against the principles of the Green Belt
- The increase in effluent requiring treatment would result in difficulties in conforming with the Water Framework Directive with regard to discharge of treated effluent into the nearby River Wey/Wey Navigation canal.
- This site is liable to flooding, being classified as flood zone 2.
- There is a risk that the site includes contaminated land. Has a Desk Study, supported by intrusive investigation been completed to identify the scope of remedial works necessary to make the site suitable for development?
- The development will result in a significant increase in traffic which the local road infrastructure cannot sustain. Currently, there is a vehicle queue of at least 100 yds every morning at peak traffic flow in Send Marsh Road B368, trying to access the Portsmouth Road B2215. This situation will be exacerbated by the proposed development with a resultant increase in the risk of accidents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/24  Respondent: 17159553 / Vicki Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal to inset Send Business park from the Green Belt because it will be situated in an area of outstanding beauty within the countryside adjacent to the Wey Navigation and there is highly restricted access along Tannery Lane in both directions. Children regularly use Tannery Lane as a cycle route away from the main roads in order to get to Send Park, and this will increase the risk to other road users, especially on bicycles. Further development of this area directly ignores the openness of the greenbelt and the value to which it provides within our community.
I request that my comments and objections are shown to the Planning Inspector and also request a confirmation to that you have received this objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/303</th>
<th>Respondent: 17159553 / Vicki Groves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A42 change at Clockbarn in Tannery Lane because the increase by 33% of homes to be developed, from 45 to 60, is too many for such a small area. It ignores all my previous objections to this proposal and, in fact, has made it worse than before even though I, and many others, objected strongly to this proposal. It worsens traffic issues in Tannery Lane, which is already a small single lane in places, and erodes the green belt. There is increased risk of flooding due to surface run off and it will affect the natural topology and countryside around the area which has already been designated as Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/304</th>
<th>Respondent: 17159553 / Vicki Groves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 change at Garlick's Arch because the site floods regularly (designated as flood zone 2) and is covered by ancient woodland, up to 500 years old, which is home to a variety of wildlife. The currently existing brownfield sites within Guildford and its surrounding areas should be fully utilised before any housing is agreed within Green Field sites. There is no proven demand for traveller sites in the location and the addition of 400 houses in a small area defies all previous objections to this proposal and is a total over-development of the village. It will essentially create a "super-village" by which Ripley and Send are amalgamated in to one and the increase in volume of traffic within the small roads and lanes around the villages will not be able to cope. There are no proposals around the increase in additional services, such as schools, doctors, shops or road improvements for the local village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp172/305</th>
<th>Respondent: 17159553 / Vicki Groves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I OBJECT to Policy A58 at Burnt Common because it ignores all previous objections made about industrial land in this location and has been added once again to the proposal after being previously removed due to public objection. The plan has changed the requirements from Maximum to Minimum of 700sq m of industrial land and there is no evidence to support this area being desirable, or necessary, for industrial expansion especially when Slyfield and Guildford still have industrial sites which are not fully utilised. The impact of industrial usage like this on small surrounding roads will be highly significant and will, once again, join Send as a Super Village to the surrounding villages whilst having a damaging impact on the surrounding green belt areas.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/309</th>
<th>Respondent: 17159809 / Cristina Sullivan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the policy A58 at burntcommon as it will destroy the area. There is absolutely no need for a minimum of 7,000 sqft of industrial/warehouse development in this area especially as there are plenty of similar developments in slyfield/Guildford that are empty. We live in the pathway and the traffic leading to burntcommon roundabout is ridiculous already adding this level of extra traffic accessing this site would completely gridlock our roads. This proposed site had already been deleted from the 2014 due to the high level of objection it is crazy that it is being re proposed now. Please do not spoil our beautiful villages.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/311</th>
<th>Respondent: 17159809 / Cristina Sullivan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the policy A58 at burntcommon as it will destroy the area. There is absolutely no need for a minimum of 7,000 sqft of industrial/warehouse development in this area especially as there are plenty of similar developments in slyfield/Guildford that are empty. We live in the pathway and the traffic leading to burntcommon roundabout is ridiculous already adding this level of extra traffic accessing this site would completely gridlock our roads. This proposed site had already been deleted from the 2014 due to the high level of objection it is crazy that it is being re proposed now. Please do not spoil our beautiful villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/327  Respondent: 17160545 / Neil Bowker  Agent: Alan Cook

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/328  Respondent: 17160737 / Thomas Wood Grilla  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/330  Respondent: 17160769 / Mr and Mrs Ringer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/331  Respondent: 17160929 / Mark Horwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/333  Respondent: 17160961 / Michael hatton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/334  Respondent: 17160993 / Judith cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/344   Respondent: 17161377 / Nancy Ena Thomson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/343   Respondent: 17161409 / Charles Graham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/339  Respondent: 17161505 / Susan Hatton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/338  Respondent: 17161537 / J. Potter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/337  Respondent: 17161569 / Esther Anne Wallenstein  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/351  Respondent: 17161889 / Mark Gurden  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
I wish to object very strongly to Policy A43, land at Garlicks Arch. It is unacceptable that you have ignored the thousands of previous objections to this proposal. There is already far too much traffic in the Ripley/Send area and this will create so much more and will effectively join the 2 towns together, defeating one of the purposes of the Green Belt.

Also I do not believe that there has been any demand for Travellers sites, so why are they being created?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/349  Respondent: 17161889 / Mark Gurden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

I wish to object very strongly to Policy A58, land at Burnt Common. This has previously been removed from the Local Plan because of the numerous objections, and to re-submit it with a minimum rather than a maximum amount of industrial place is ridiculous, especially given that the demand for such space has dropped and nearby established sites such as Slyfield have empty units.

There is already far too much traffic in the Ripley/Send area and this will create so much more and will effectively join the 2 towns together, defeating one of the purposes of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/357  Respondent: 17163361 / Victoria Marr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

I wish to object very strongly to Policy A42, land at Garlicks Arch. It is unacceptable that you have ignored the thousands of previous objections to this proposal. There is already far too much traffic in the Ripley/Send area and this will create so much more and will effectively join the 2 towns together, defeating one of the purposes of the Green Belt.

Also I do not believe that there has been any demand for Travellers sites, so why are they being created?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
• The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, Send will have a significant impact on the already highly congested local rural road network around and within Ripley. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/355  Respondent: 17163361 / Victoria Marr  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Any development at Site A43 Garlicks Arch would be on Green Belt land, and there is no identified or exceptional need within the Local Plan documentation
• The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Green Belt and there is no identified need within the Local Plan
• The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. The Plan is self-inconsistent and therefore not properly constituted.
• The potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. The plan states that “if the [Traveller sites] remains unsold, the future use of the land should have regard to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with specific consideration of the use of the land for affordable housing”. So even more travellers pitches and houses, which is unjustified.
• Section 4.2.22 of the Plan states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Travelling Showpeople” So why do 75% of them have to be in Ripley? This is unbalanced and unfair.
• The removal of site A46 from the Plan (with its proposed 1100 houses) has left the Plan even further unbalanced against the North East of the Borough with over 40% of the development proposed in this small area of Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/356  Respondent: 17163361 / Victoria Marr  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

- The potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.
- The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a and does not allow for full and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/361  Respondent: 17163425 / Richard Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 – I object to Policy A42 as the infrastructure of Send cannot manage such an increase in housing. Traffic is already unmanageable in the village and at peak times can take between 15-20 minutes to get out of Send; significantly impacting journey times to schools and work. This is also against previous objections made by local residents and will impact the surrounding countryside / greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/362  Respondent: 17163425 / Richard Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A43 – I object to Policy A43. This massive increase in housing plus travelling show-people plots is an over-development that would destroy the Green Belt and woodland, join up Ripley and Send plus yet again put additional stress on the fragile traffic system in and around Send, Ripley and the A3. This is also against previous objections and is frustrating to see on the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp172/364  **Respondent:** 17163425 / Richard Turner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Policy A58 – I object to Policy A58 as I don’t see a need for industrial development and/or warehousing. Slyfield and Guildford have many units and areas available so unclear on where the demand for this proposal comes from. There would again be further impact on local roads and again join up villages unnecessarily.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp173/40  **Respondent:** 17164001 / C. Sims-Hancock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT TO THE POLICIES

- A42 CHANGE AT CLOCKBURN IN TANNERY LANE
- A43 CHANGE AT GARLICK’S ARCH, SEND MARSH
- A58 CHANGE AT LAND AT BURNT COMMON, LONDON ROAD
- 2 AT PARAGRAPH 4.3.15 regarding the removal of SEND BUSINESS PARK FROM THE GREEN BELT

BECAUSE:
- these developments are in opposition to local requirements, infrastructure and against the desire of local residents
- this is a careless, callous destruction of the green belt, and it will negatively affect us and future generations

There is no evidence supporting the approach and requirements GBC are promoting, and GBC are acting without the support of the community - in fact, GBC are acting in complete contradiction to the community and are disregarding the objections raised by the community.

I call for full financial and relationship interest disclosure of every member and their immediate families/significant others of GBC. This is a common practice where individuals and companies are regulated in financial commercial practice, and I believe it is in the interest of the community to have this visibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp173/42 **Respondent:** 17164033 / David Roberts **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Sites A36-41 (East and West Horsley)**

This submission focuses on changes made to the 2016 draft Local Plan. In the case of Sites A36-41, the changes are minimal. This ignores the high volume of serious objections submitted to this part of the plan.

The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

The new draft remains objectionable for three main reasons:

1. Based on Guildford Borough Council’s own figures, marginal changes such as these would still leave 7% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.
2. The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.
3. No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend. It would not be difficult (e.g. with the help of the draft West Horsley Neighbourhood Plan) to set out a proper, more integrated vision for this part of the borough. Without this, the plan is not a plan for the Horsleys in any practical sense.

The Inspector will also want to have regard to the feeling among Horsley residents that this limited approach is deliberate – driven by a concealed wish to turn their community into a new dormitory town. Plausible claims have been made of political bias by a Council leadership representing the western end of the borough, which is less threatened by London urban sprawl.
The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents. The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.

The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/929  Respondent: 17164033 / David Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Policy E1, E2: employment land**

I OBJECT that too much land in the urban centre in the revised Plan is allocated for retail or commercial use. Too much of that, in turn, is designated for land-hungry retail of low-value-added commercial floorspace such as warehousing. This will:

- Discourage the building of much-needed housing (especially low-cost homes) in convenient locations (especially urban brownfield sites) in accordance with national trends and Government policy;
- Deter the promotion of high-value-added businesses more in keeping with the declared aims of the local authorities and Enterprise Partnership;
- Aggravate town-centre traffic problems and the current decay of independent high-street businesses that reflects a pronounced, national shift away from town-centre shopping towards online trade; and
- Encroach needlessly on the Green Belt at inappropriate sites such as Burnt Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the deletion of provision in Policy H1 relating to housing density, which is a normal planning requirement for the control of development. This deletion opens the way for a free-for-all in which developers decide maximum and minimum densities on purely self-interested grounds. It conflicts with Government policy on the rational and cost-effective use of land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Policy H1: land use

I object to the deletion of provision in Policy H1 relating to housing density, which is a normal planning requirement for the control of development. This deletion opens the way for a free-for-all in which developers decide maximum and minimum densities on purely self-interested grounds. It conflicts with Government policy on the rational and cost-effective use of land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

1. Policy D1: infrastructure

I object to the mismatch between the latest Plan’s ambitious development targets and that lack of any realistic plans for adequate infrastructure, as already highlighted in previous public consultations.

The Council have lately acknowledged that infrastructure is a constraint, and no-one expects all infrastructure to be pre-positioned before any development can take place. But the lack of any explanation as to how infrastructure improvements will, even roughly, be on the right scale is a giant hole in the Plan that invalidates most of its housing and other aspirations.

Policy D1’s assumption that the “infrastructure provider” will maintain infrastructure in most cases, and that developers will offer contributions via Community Infrastructure Levy, is inadequate. Deliberately setting out excessive development...
targets you know can never be met (and which create public alarm) is a planning failure that the Inspector should challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/927</th>
<th>Respondent: 17164033 / David Roberts</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Policy P1 and E5: AONB**

I **OBJECT** to the deletion of restrictions on non-major development in the AONB, which appears to dispense with the previous five key tests. This runs contrary to Government policy enshrined in the NPPF, public opinion as voiced in previous consultations and Guildford Council leader’s increasing assurances that the AONB will be afforded the highest level of protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/928</th>
<th>Respondent: 17164033 / David Roberts</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Policy P2, P3, E5 and Sites: Green Belt**

I **OBJECT** to those features of the latest draft Plan which, taken together, amount to a pre-determined attack on the Green Belt that conflicts with the Government’s policy commitment to sustainable development. These include:

- The proposal to locate 70% of new housing in the countryside and 58% in the Green Belt. This fails the test of common sense and proportionality, whereby any reasonable person might expect development to be concentrated in areas with existing infrastructure and facilities, and for each local community to bear a fair burden of disruptive development roughly according to its size.
- The location of three major strategic sites in the Green Belt: Blackwell Farm, Three Farms Meadow (so-called Wisley airfield) and Gosden Hill Farm. The failure to explain why this is necessary is unsound.
- The glaring absence of any “exceptional circumstance” justification, as required by the NPPF.
The “insetting” of most of the borough’s rural villages from the Green Belt, threatening an irreversible loss of character amounting to a suburbanisation of much of the borough. Guildford would merge with Woking and an almost unbroken corridor of development would be created from Cobham to Guildford. Policy P2 misleadingly suggests that 14 villages “are now inset from the Green Belt”, creating an air of fait accompli. The draft Plan contains no reasoned arguments why this insetting has to be so extensive.

Radical and arbitrary “infilling” and extensions of settlement boundaries (e.g. in rural West Horsley) prejudicing future planning decisions in favour of development.

The absence of any systematic attempt in the draft Plan to mitigate damage to the Green Belt by auditing, cataloguing and prioritising the development of urban brownfield sites, many of which the Council already own. This is contrary to national policy and the Council’s own declared policy.

The abuse of the “affordable” homes mechanism in the Rural Economic Strategy (para. 4.51a) to promote disproportionate development in the countryside, including the AONB. This has been sneaked in without proper public consultation and is based on out-of-date data.

The failure to acknowledge the key part Metropolitan Green Belt development restrictions have historically played in incentivising urban regeneration (most spectacularly in central London) and its potential make-or-break role in the modernisation and revival of Guildford town centre.

The lack of any concession to the sheer weight of tens of thousands of previous public objections to Green Belt over development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/925  **Respondent:** 17164033 / David Roberts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? (No), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **Policy S2: housing number**

**OBJECT** to the revised target of 12,426 homes, since:

- This remains based on a formula that has not been made public and therefore cannot be verified and has never been scrutinised either by Councillors or the public, despite many strenuous, well-documented efforts to get it revealed;

- The draft Plan advances no justification for identifying the unconstrained OAN with the housing target and is unsound in this respect;

- Fundamental flaws in the SHMA’s OAN calculations have, in any case, been exposed in extremely detailed studies, e.g. by Cllr David Reeve and by Neil MacDonald of NMSS. These suggest not only that the numbers are excessive but that the target for the whole plan period is a moving one, subject to phased building and progress on infrastructure;

- A more realistic target with relevant constraints applied would potentially remove the need to build on green fields and, at a stroke, answer many other objections to the Plan.
Separately, I **OBJECT** that S2 fails to amount to a policy. Whether or not one agrees with the housing numbers or with a phased approach, it does not set out clear and transparent planning goals that can be understood and monitored. Using this draft, it would never be possible for the Government or public to say whether Guildford is on target or not.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| **Comment ID:** pslp173/47  **Respondent:** 17166241 / Eloise Knights  **Agent:** |
| **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt, Policy 2 at paragraph 4.3.15**

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| **Comment ID:** pslp172/388  **Respondent:** 17166241 / Eloise Knights  **Agent:** |
| **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Clockbarn Nursery, Tannery Lane, Policy A42**

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- It ignores all the hundred of previous objections made by local people
- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will cause erosion of the Green Belt in our village
• It will increase surface water flooding, which is already a problem and is increasing with further development
• It will impact on the open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/389  Respondent: 17166241 / Eloise Knights  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlik’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch because:

• It ignores all the thousands of previous objections made by local people
• The is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
• It will cause overdevelopment of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1
• It will join p Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over 50 years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/390  Respondent: 17166241 / Eloise Knights  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Burn Common, London Road, Policy A58

I object to Policy A58 at Burn Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
• There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/48  Respondent: 17167969 / Harry Knights  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/391  Respondent: 17167969 / Harry Knights  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- It ignores all the hundred of previous objections made by local people
- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will cause erosion of the Green Belt in our village
- It will increase surface water flooding, which is already a problem and is increasing with further development
- It will impact on the open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/392</th>
<th>Respondent: 17167969 / Harry Knights</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlik’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- The is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
- It will cause overdevelopment of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth 1
- It will join p Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/393</th>
<th>Respondent: 17167969 / Harry Knights</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### Land at Burn Common, London Road, Policy A58

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/49</th>
<th>Respondent: 17168001 / Henry Knights</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/394</th>
<th>Respondent: 17168001 / Henry Knights</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

• It ignores all the hundred of previous objections made by local people
• The plans have increased from 45 homes to 60 homes which is 33% and this is too much
• It will increase problems with the traffic in Tannery Lane and at the A247 junction
• It will cause erosion of the Green Belt in our village
• It will increase surface water flooding, which is already a problem and is increasing with further development
• It will impact on the open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/395  Respondent: 17168001 / Henry Knights  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch because:

• It ignores all the thousands of previous objections made by local people
• The is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
• It will cause overdevelopment of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth I
• It will join p Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over 50 years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/396  Respondent: 17168001 / Henry Knights  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Land at Burn Common, London Road, Policy A58**

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously.
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land.
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
- The impact on small surrounding roads will create traffic gridlock.
- It will join up the existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/50  Respondent: 17168033 / Jacqueline Knights  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

**Green Belt, Policy 2 at paragraph 4.3.15**

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.
- There is highly restricted vehicular access along Tannery Lane in both directions.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/397  Respondent: 17168033 / Jacqueline Knights  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- It ignores all the hundred of previous objections made by local people
- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will cause erosion of the Green Belt in our village
- It will increase surface water flooding, which is already a problem and is increasing with further development
- It will impact on the open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/398</th>
<th>Respondent: 17168033 / Jacqueline Knights</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick's Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick's Arch because:

- It ignores all the thousands of previous objections made by local people
- The is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
- It will cause overdevelopment of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join p Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/399</th>
<th>Respondent: 17168033 / Jacqueline Knights</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1911 of 2988
Land at Burn Common, London Road, Policy A58

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/437  Respondent: 17169569 / G. Langley  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/436  Respondent: 17169633 / Jennifer Catt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/434  Respondent: 17169665 / Simon Curtls  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/433  Respondent: 17169697 / Robert Sanders  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/428   Respondent: 17169825 / Chris Austen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/424   Respondent: 17169857 / Roger Gabriel   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Page 1915 of 2988
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/422  Respondent: 17169889 / Valerie Ann Meldrum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/421  Respondent: 17169921 / Jenny Cropper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/420  Respondent: 17169953 / Claire Billimore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/418  Respondent: 17169985 / Ben Cross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/417</th>
<th>Respondent: 17170049 / Alison Davis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/416</th>
<th>Respondent: 17170081 / Anthony Gysi</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/54  Respondent: 17172833 / Susan Ranson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The below refers to changes made to the 2016 draft Local Plan. In the case of Sites A36-41, the changes are minimal. This ignores the high volume of serious objections submitted to this part of the plan.

The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

The new draft remains objectionable for three main reasons:

1. Based on Guildford Borough Council’s own figures, marginal changes such as these would still leave 56.7% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification has been demonstrated to justify this.

2. The removal of two Horsley sites fails to correct the issue of overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.

3. No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend. It would not be difficult (e.g. with the help of the draft West Horsley Neighbourhood Plan) to set out a proper, more integrated vision for this part of the borough. Without this, the plan is not a plan for the Horsleys in any practical sense.
The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.

The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

The remaining four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. Sites A35-41 are contrary to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp172/459</th>
<th>Respondent: 17174017 / Joanne Moxon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Land at Garlik’s Arch, Send Marsh, Policy A43**

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
- It will cause overdevelopment of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth 1
- It will join Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/50</th>
<th>Respondent: 17174017 / Joanne Moxon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Land at Burn Common, London Road, Policy A58**

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Green Belt, Policy 2 at paragraph 4.3.15 I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. There is highly restricted vehicular access along Tannery Lane in both directions. Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/463  Respondent: 17174273 / Nicolas Marsn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/466  Respondent: 17174369 / Alison Woodgara  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/471  Respondent: 17174433 / Shaun Groves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/500  Respondent: 17175105 / Wendy Horwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: Pslp172/499</th>
<th>Respondent: 17175169 / Jamie Avenell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</td>
<td>is Sound? ( )</td>
<td>is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: Pslp172/497</th>
<th>Respondent: 17175233 / Jean Ford</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( )</td>
<td>is Sound? ( )</td>
<td>is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/496  Respondent: 17175329 / Adrienne Mary Maskell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/495  Respondent: 17175361 / Catherine Tucher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/494  Respondent: 17175425 / Ivan Bendy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/493  Respondent: 17175457 / Lesley Palknor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/490  Respondent: 17175489 / Nigel & Brenda Essex  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/488  Respondent: 17175585 / J.E. Sines  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/483  Respondent: 17175617 / Linda Halsey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/487  Respondent: 17175649 / Dennis Moore  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/58  Respondent: 17178049 / Cam Pulham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The location is already congested and the road not up to the current demands of the area. The land is green belt, and apart from the business units, a beautiful area. This will only lead to more unsightly development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/501  Respondent: 17178049 / Cam Pulham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this on the basis that there is limited road access already along Tannery Lane and this has already been objected to. This alteration adds 15 more homes accessing a busy main road that is already difficult to cross. With the on street parking around here, this junction will become increasingly dangerous. This is on Green Belt land that should be saved to allow for surface drainage. Send is a village and this level of unsympathetic development will ruin the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Land at Garlicks Arch is green belt land and will result in the lack of definition between Send and Ripley. It is unique in its nature and has survived for generations without having this significant development placed here. Given the size of the community, this is massive over development of the area. Again, the traffic build up with this new development would clog up the local area, not to mention the showman’s traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I see no demand for industrial units in this area as units are still unoccupied in the immediate vicinity and economic trends will keep it this way for the foreseeable future. Why is Slyfield not being considered as part of this plan? This is green belt land and should not be used for any purpose, least of all commercial use when there is no proven need.

The traffic would lead to a significant increase in road movements in the area and will effectively join up local communities and the area will lose it’s identity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from Green Belt because I believe that further expansion or development at this location totally detracts from the openness of the green belt and it is inappropriate. Tannery lane is a country lane with restricted access in both directions.

I moved from West Byfleet to Send because of the proposed development of West Byfleet. I do not want to live in a built up, polluted, noisy and traffic ridden environment. Our green spaces and areas of natural beauty must be protected from over development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

object to Policy A42 change - Clockbarn in Tannery Lane because this increase is too much. It will worsen access and traffic problems already in Tannery Lane and at the junction of the A247. Tannery Lane is a picturesque country lane that forms part of the Village of Send and we wish to protect the views, wildlife and green open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/505  Respondent: 17178113 / Laura Frankland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 change - Land at Garlick’s Arch, Send Marsh because it ignores thousands of previous objections made by local people. There is no proven demand for Travelling Showpeople plots in this location. It will cause overdevelopment of our village generating excessive traffic and ruin for ever the green open space that should be protected for future generations to enjoy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/506  Respondent: 17178113 / Laura Frankland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 – Land at Burnt Common because it has previously been deleted due to all of the objections previously made. There is no need to build an industrial or warehouse development in the middle of the Green Belt as there are still empty sites in other locations for this use. The impact on traffic will create issues in our village and it will lose its village feel!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/515  Respondent: 17178401 / Hugh Marr  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Any development at Site A43 Garlicks Arch would be on Green Belt land, and there is no identified or exceptional need within the Local Plan documentation
- The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Green Belt and there is no identified need within the Local Plan
- The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. The Plan is self-inconsistent and therefore not properly constituted.
- The potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. The plan states that "if the [Traveller sites] remains unsold, the future use of the land should have regard to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with
specific consideration of the use of the land for affordable housing”. So even more travellers pitches and houses, which is unjustified.

- Section 4.2.22 of the Plan states “Sufficient sites are identified within the Local Plan [for] 8 plots for Travelling Showpeople” So why do 75% of them have to be in Ripley? This is unbalanced and unfair.
- The removal of site A46 from the Plan (with its proposed 1100 houses) has left the Plan even further unbalanced against the North East of the Borough with over 40% of the development proposed in this small area of Green Belt
- The potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document
- The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a and does not allow for full consultation
- The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, Send will have a significant impact on the already highly congested local rural road network around and within Ripley. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/516  Respondent: 17178433 / Beta Lebon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/520  Respondent: 17178625 / John p Anderman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/524  Respondent: 17178817 / Jill Henderson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/526  Respondent: 17178849 / Trevor McGavin  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/527  Respondent: 17178881 / Angela Briggs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/540  Respondent: 17184321 / Kathleen Jemmets  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/541  Respondent: 17184417 / Donald Pedonis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

In regard to the local plan 2017;

I object to the policy A42 at Clockbarn in tannery lane because of the traffic primarily. This area has become a rat run from Old Woking and Woking to the M25 some evening it is hopeless to even try driving. Now 60 homes in place of 45 homes is unacceptable increase, which will certainly create a huge burden on traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/542  Respondent: 17184417 / Donald Pedonis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the policy A43 land at Garlicks Arch at Send Marsh on two accounts: one there is no proven need for travelling show people in this area. This number of homes (400) will join Ripley and Send into one huge conabation. Traffic on the Portsmouth road in over crowded and dangerous now and with cars that 400 homes will produce will make the morning and evening commute into one long and miserable traffic jam.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/543  Respondent: 17184417 / Donald Pedonis  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to policy A58 at burnt common because it is unnecessary and will seal conbation from Ripley through to Send destroying the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/63  Respondent: 17184417 / Donald Pedonis  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the proposal to inset Send business park from the Green Belt ( Policy 2 at paragraph 4.B.15) because it would completely distory the openness of the Green Belt and is inappropriate. That area floods regularly and development would increase the problem of traffic and pollution.

Thank you for allowing my objections to the 2017 plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/545  Respondent: 17184513 / Chris Sharpes  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/550  Respondent: 17184801 / David Phillip Griffiths  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/552  Respondent: 17184833 / Malcolm Airey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/1225  **Respondent:** 17184833 / Malcolm Airey  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Policy A26 (Blackwell Farm)

As a resident of Compton I strongly object to the proposal to build 1,800 homes on the Blackwell Farm site as it will have a very negative on the environment in the surrounding area.

MORE TRAFFIC. The site is dependent on a new access road from the A31 Hog's Back to the hospital roundabout at Egerton Road, with a new signalised junction on the A31 at the entrance to Down Place, at the top of Down Lane. An independent traffic study commissioned by Compton Parish Council has shown that this new junction would result in more queuing on the I-log's Back and on the A3 during the morning peak-hour. In fact, the queue builds up all through the day, not just during rush hour. As a result, Compton will see a surge in traffic as Guildford-bound drivers seek out the fastest route and drive along the B3000 or Down Lane. The recent chaos caused by the closure of the A31 westbound because the surface melted in the heat demonstrated what could happen and the probability of vastly increased numbers of vehicles using the roads will multiply the problem a thousandfold.

MORE POLLUTION. Levels of Nitrogen Dioxide (NO2) that are consistently well above the EU legal limit have been recorded at the A3 end of 'The Street in Compton over the last two years. The Parish Council is expecting that this section of the 133000 will he made an Air Quality Management Area soon. Any increase in traffic levels through Compton, such as the proposed access road to Blackwell Farm, will make this situation worse.
LOSS OF NATIONALLY IMPORTANT COUNTRYSIDE. The new access road would cut through the Surrey hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the I-log's Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The development site includes high-grade farmland and forms 20% of Compton's green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/553  Respondent: 17184865 / Sylvia Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/554  Respondent: 17184897 / A C Stockbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/555  Respondent: 17184929 / Claire Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/556  Respondent: 17184961 / Colin May  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/558  Respondent: 17184993 / Zartasha Chaudhry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/564  Respondent: 17185025 / Tim Lebon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/559  Respondent: 17185057 / Sophie Langdon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/560  Respondent: 17185089 / Marion Southwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/561</th>
<th>Respondent:</th>
<th>17185121 / F Bishop</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/562</th>
<th>Respondent:</th>
<th>17185153 / Ingrid Londel</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/563  Respondent: 17185185 / Robin Privett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/565  Respondent: 17185217 / Clive Frank James Daborn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/566  Respondent: 17185249 / Stephen Swain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/568  Respondent: 17185281 / J Holbrook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/569  Respondent: 17186273 / Sharon ann Dick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/570  Respondent: 17186337 / Teresa Lane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/572  Respondent: 17186433 / Richard W Baldwin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 because:

The plan has ignored previous objection by residents of Send.

There is an increase, over the previous plan, of 15 homes.

Tannery Lane, and especially its junction with the A247, is unsuitable for more traffic.

The area is subject to surface water flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/573  Respondent: 17186433 / Richard W Baldwin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 because:
This is Green Belt, and no exceptional circumstances exist.
It is a site of ancient woodland.
The site is subject to frequent flooding.
The additional traffic generated will cause traffic jams in Send.
There is no shown demand for Travelling Showpeople plots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/574</th>
<th>Respondent: 17186433 / Richard W Baldwin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Policy A58 because:
It was deleted from the 2014 draft because of previous objections.
The ‘maximum’ in the 2016 draft has now become a ‘minimum’.
The 2017 Employment Land Need Assessment indicates a demand for a total of 3.9 hectares for industrial land in Guildford Borough. Why allocate 10 hectares in Send Green Belt?
There are empty sites and industrial units in Slyfield.
The increase in traffic cannot be managed without gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/576</th>
<th>Respondent: 17186465 / Ian Robert Moore</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/583  **Respondent:** 17188769 / D.J Geenslade  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/577  **Respondent:** 17189057 / Kathryn Fox  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
I write to raise further objections to plans for the Send area. Please find a summary of my objections as follows:

Clockbarn Nursery, Tannery Lane, Policy A42
I object to the Policy A42 change at Clockbarn in Tannery Lane because:
• The increase to 60 homes in place of 45 homes is 33% more and is already too much
• It ignores all the thousands of previous objections made by local people that live in Send
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse
• It will impact open countryside views from the River Wey Navigation
• The local school and doctor’s surgery are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Land at Garlick's Arch, Send Marsh, Policy A43
I object to the Policy A43 change at Garlick's Arch because:
• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location and is not wanted
• It is beautiful permanent Green Belt and no "exceptional circumstances" exist
• It will cause over-development of our village and the number of homes is hugely excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads even more than already does of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58.
I object to Policy A 58 at Burnt Common because:
• It was deleted from the 2014 draft because of all the objections made previously
• The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/64  Respondent: 17189057 / Kathryn Fox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15
I object to the proposal to inset Send Business Park from the Green Belt because:
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/588  Respondent: 17189185 / Agus James Betall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/619   Respondent: 17191841 / Tim Payne   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/621   Respondent: 17191841 / Tim Payne   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/620  Respondent: 17191873 / Mark Ward  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/642  Respondent: 17191905 / J.A. Fonning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/624  Respondent: 17191937 / David Brewer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/638  Respondent: 17191969 / Stuart David Maves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceeds safe EU limits

We would appreciate it if you could consider our concerns with regards these development plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/651  Respondent: 17198977 / Richard Hirst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceeds safe EU limits

We would appreciate it if you could consider our concerns with regards these development plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceeds safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/78  Respondent: 17199937 / Jean Middleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We wish to object to the above mentioned plans policy numbers A27 A28 &A29 and to the map on page 301(offices).

This Area is already overcrowded and any further buildings will exacerbate the present situation.

Has any thought been given to the loss of countryside, extra traffic causing yet more congestion & pollution - I doubt it.

It is high time that other areas around Guildford are targeted with extra houses etc and NOT Ash as appears to be the first choice of the Council!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/678  Respondent: 17199969 / Lucy Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing at Garlicks Arch would be on greenbelt, harmful to the Land and existing villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/681  Respondent: 17200033 / Eileen Barr  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the Policy A42 change at Tannery Lane because increasing the number of homes from 45 to 60 will worsen access and traffic problems in Tannery Lane and at the A247 junction, it is an erosion of the Green Belt and will impact open countryside views.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/682  Respondent: 17200033 / Eileen Barr  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the Policy A43 change at Garlick's Arch because it ignores the thousands of previous objections, the provision of 8 Travelling Showpeople plots is out of proportion, the number of houses is excessive and will cause the loss of ancient woodland, might exacerbate flooding in the area and will generate excessive traffic on roads and villages which cannot cope with the present volume of traffic at peak times. We are retired so don't travel to work during rush hour but if we have a doctor's appointment the volume of traffic has a significant impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Policy A58 at Burnt Common, London Road because it was deleted from the 2014 draft because of the amount of objections, the word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land, there is no need to build industrial or warehouse development in the Green Belt when Slyfield and Guildford still have empty sites and industrial units, the proposal is a huge over allocation of 10 hectares although the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough, even more traffic would be using small surrounding roads which can't cope with present traffic volumes. Besides causing gridlock all this overdevelopment will obviously contribute to a worsening of air pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

In response to the proposed plan targeting Ash and Tongham areas, I strongly disagree with the construction of 1750 new homes being built. I object to policy numbers A27, A28, A29 and to the map on page 301 (offices) because of the loss of countryside and amenity, along with the roads in this area not being able to cope with all the extra traffic that would because by this. There will be an increased numbers of parked cars which will increase congestion levels around this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to you to object to parts of the local plan in Guildford.

Firstly, I live on [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and I have noted that the SRN6 "Beechcroft Drive safety scheme" has been removed from the local plan.

Having spoken to the highways agency they have requested this be removed, as they will "not be able to fulfil the request in time of the local plan".

The local plan is something like 10 years, so I don’t understand why this has been removed, especially as a recent study carried out by the highways agent recommended that the Beechcroft drive access be closed and a suitable and safe alternative be found.

We have older residents living on the road who cannot leave via car now, and we think that the A3 has become so busy now it is only a matter of time before a fatal accident.

If Beechcroft Drive is not made safe, there is no way the A3 can be widened as we will not be able to cross safely into our road, and if the A3 is not widened then how will Guildford cope with the extra traffic of a huge housing development? The university promised in 2003 to make the land of Blackwell farm publicly accessible as a communal area, they have gone back on their word and are putting profits in front of the needs of local people and wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I am also objecting to the Blackwell Farm development due to:

- The plan disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- It directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- It ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• It adds to air pollution in neighbouring areas, which already exceeds safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/696  Respondent: 17200449 / Sharon Searle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am whole hearted opposed to the building of any sort on Black Well Farm or any part of the Hogs Back. There is no need for this green belt land to be built on when there are other sites that have already been given for this purpose. Shame on you Guildford Borough Council AND University of Surrey!

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/81  Respondent: 17200641 / Lucy Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to lodge my objections to the changes to the local plan. It is inconceivable that consultation is still ongoing about this. The local and wider public made their views totally clear the first time round and were largely ignored. This is absurd in that councillors are elected by and for the people and their views were that there is too much building and on greenbelt.

My primary objections this time:

- Housing at Garlicks Arch would be on greenbelt, harmful to the Land and existing villages.
- Travelling plots are inappropriate, ill-designated and unnecessary.
- There is not the space or proper consideration given to Burnt Common proposals.
- The site at Tannery Lane cannot support such numbers.

Please consider this and the other thousands of objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/703  Respondent: 17201121 / Pamela Parke  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/707  Respondent: 17201217 / Malcolm Hodgson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/715</th>
<th>Respondent:</th>
<th>17201441 / Jo Dwyer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/716</th>
<th>Respondent:</th>
<th>17201473 / Paul Carter</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/722  Respondent: 17201537 / Rachael Way  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/724  Respondent: 17201601 / John Corbett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/725  Respondent: 17201633 / Brian Dunce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/726  Respondent: 17201665 / Christine Hodgson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/742</th>
<th>Respondent: 17203521 / Nicholas Brown</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/744</th>
<th>Respondent: 17203553 / S Jordan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/747  Respondent: 17203969 / Pauline Coulter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/748  Respondent: 17204001 / Pamela Patrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/749  Respondent: 17204129 / Julia Elizabeth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/750  Respondent: 17204161 / C.I Carr - White  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/751  Respondent: 17204321 / Jenifer Luck  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/753  Respondent: 17204385 / Jill Kilburn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/755  Respondent: 17204449 / Susan Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/757  Respondent: 17204513 / Jan Reid Holgate  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/759  Respondent: 17204545 / Turner Family  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/766  Respondent: 17205089 / Janet A Parry-Moms  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Guildford Local Plan 2017 as shown below: I object to the Policy A 42 change at Clockbam in Tannery Lane because: The increase in the number of houses to 60 from 45 is too much. Previous objections from local people have been ignored. Traffic access problems in Tannery Lane and at the A247 junction would worsen. Green Belt would be eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/769</th>
<th>Respondent:</th>
<th>17205089 / Janet A Parry-Moms</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A 43 change at Garlick's Arch because: Previous objections from local people have been ignored. No 'exceptional circumstances' exist to damage the Green Belt permanently. No reason for Travelling Showpeople plots has been proven. There would be excessive homes, and our village would be over-developed. The area is subject to frequent flooding, which would be made worse. Local traffic issues would worsen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/772</th>
<th>Respondent:</th>
<th>17205089 / Janet A Parry-Moms</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A 58 at Burnt Common because: The policy had been previously deleted from the 2014 draft because of objections. There are empty sites at Slyfield, making the development at Burnt Common unnecessary. Adjacent villages would be joined, sacrificing Green Belt. Local roads would become gridlocked by increased traffic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/764</th>
<th>Respondent: 17205121 / Madeleine Davis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Clockbam Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The large number of previous objections made by the local people has been ignored.
- The increase from 45 homes to 60 homes is too high.
- It will make worse the traffic problems in Tannery Lane and at the A247 junction.
- There is already surface water flooding and this will make it worse.
- The open countryside views from the River Way will be ruined.
- The Green Belt in our area has already been eroded and this will worsen the situation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/768</th>
<th>Respondent: 17205121 / Madeleine Davis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Land at Garlick's Arch, Send Marsh, Policy A43

I object strongly to the Policy A43 change at Garlick’s Arch because:

The proposed number of 400 homes is excessive. We do not have the schools and medical services large enough to cope with this influx of at least another 800 people.

There is no proven demand for Travelling Show people plots in this location.

Ripley and Send will be joined up.

Thousands of previous objections have been blatently ignored

It is ancient woodland and needs to be protected at all costs.

It is currently a flood zone 2 allocation and subject to frequent flooding.

Fifty years of shooting has resulted in contamination by lead shot.

The traffic in the area is already excessive, with long delays occurring in Send Marsh Road and Send Road at peak times. The proposed increase in housing will only exacerbate the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/770  Respondent: 17205121 / Madeleine Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because:

• There is absolutely no need to build industrial or warehouse development in the middle of the Green Belt. There are empty sites remaining at Slyfield and Guildford.

• Because of all the objections made previously, this was deleted from the 2014 draft

• The 2016 plan has changed the word "minimum" to "maximum" and since that time there has been a decline in demand for industrial land. In fact, the 2017 Employment Land Need Assessment shows a reduction in demand to 9 hectares for industrial land for the whole borough, NOT a huge over-allocation of 10 hectares at Send in the Green Belt.

• The traffic, which is already too heavy, will be vastly increased.

• The existing villages will be joined up and the Green Belt lost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Green Belt, Policy 2 at Paragraph 4.3.15

I strongly object to the proposal to inset Send Business Park from the Green Belt because:

- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.
- The vehicular access along Tannery Lane (in both directions) is extremely restricted.
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

I sincerely hope that my objections will be sympathetically considered and that common sense prevails. Once the Green Belt has been lost and our beautiful villages spoil there is no turning back.

The infrastructure of our villages is not able to support a substantial increase in population and traffic. The houses will not be affordable because in this area nothing is affordable. This can be seen by the 5 bedroom executive homes that are built on any bit of land that does become available. The only people who will benefit from these plans are those who will be involved in the building, thereby increasing their bank balances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the Policy A42 change at Clockbarn in Tannery Lane because the junction of Tannery Lane and the A247 is bad for access and the increase from 45 to 60 homes will make it even worse. It will also be worse along the narrow Tannery Lane. it further erodes the Green Belt around Send village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/774  Respondent: 17205249 / Dorothy Ann Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the Policy A43 change at Garlick's Arch because: it ignores the thousands of objections already made by local people.it is permanent Green Belt and there are no 'Exceptional Circumstances'.the number of proposed homes is excessive, causing over-development, and will join Ripley and Send, thus destroying the Green Belt purpose.it will cause excessive traffic, choking the local roads of Ripley and Send.provision of plots for Travelling Showpeople has not been proved to be required here, and the provision is only valid policy for sites of more than 500 dwellings. The plan is self-inconsistent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/775  Respondent: 17205249 / Dorothy Ann Sprigings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to Policy A58 at Burnt Common because:Slyfield and Guildford still have empty sites and industrial units, so there is no need to build industrial or warehouse space in the Green Belt.the allocation of 10 hectares of industrial land in Send Green Belt is unnecessary and totally disproportionate for the local area when the 2017 Employment Land Need Assessment shows a reduction in demand for industrial land for the whole borough to 3.9 hectares.there has been a decline in demand for industrial land since the 2016 plan, but the word 'maximum' has been changed to 'minimum' regarding the area. This ambiguity and lack of detail does not provide local residents with enough information for proper consultation.the potential for a Waste Management Facility at A58 Burnt Common is mentioned obscurely in 4.423a and does not allow for proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/776  Respondent: 17205409 / L. Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/777  Respondent: 17205441 / Paul Tombleson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/783  Respondent: 17205665 / Janet Hourigan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/784  Respondent: 17205761 / Marie-Claire Arthur  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/786  Respondent: 17205793 / Mr And Mrs Bishop  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/785  Respondent: 17205825 / A. Paul Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/787  Respondent: 17205857 / Simon Brundan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/788  Respondent: 17205889 / Marian Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/791  Respondent: 17206049 / Morgane Knapp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/792  Respondent: 17206081 / David Knapp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/793  Respondent: 17206113 / B.I. Killen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/796  Respondent: 17206177 / Ian William Groden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Clockbarn Nursery, Tannery Lane, Policy A42

Objection

Send’s contribution has been increased at this site with no justification despite a reduction in overall housing numbers in the borough and the large number of previous objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/797  Respondent: 17206177 / Ian William Groden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58

Objections

Why has the “up to” 7000 sq m of employment floorspace, which appears to have moved from Garlick’s Arch, been changed to “minimum of 7000 sq m with a potential for further industrial floorspace to meet borough needs”? I understand the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for Industrial land for the whole borough, not a huge over allocation of over 9 hectares potential development at Send in the Green Belt. The impact of substantial development on the surrounding roads, environment and life of the Residents would be serious and would virtually join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/834  Respondent: 17206209 / Jenna Crombie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the amendment made to A42 - increasing rather than decreasing the impact/burden of the Local Plan on the village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the amendment to A43, in that it not only fails to reduce the number of homes still proposed (remaining at the disproportionately high number of 400), but it also adds the provision of sites for 'Travelling Show People'.

I object in the strongest possible terms to the impact these recommendations will have on local roads (volume of traffic and addition to the already high level of general and noise pollution), the destruction of greenbelt and the undeniable ruining of the village of Send by placing a disproportionately high burden on Send (why are these housing needs not being more evenly distributed across the borough?) There are also other nearby developments in the Horsley and Clandon areas that means a huge volume of this change will impact a small patch of the borough and the proposed infrastructure changes will not be sufficient - even if they are carried through in every instance, which seems extremely unlikely given the current and future chronic pressures on public funding.

Are residents to be compensated for the destruction of greenbelt, impact on their local services and very likely negative impact on house prices?

The plan should be amended to more evenly share the burden across the borough. The plan should also remove provision of sites for 'Travelling show people' under A43. There is already increasingly heavy traffic traveling through Send accessing the A3 road and Old Woking/Woking. These changes will further impact these roads and negatively impact residents wellbeing (pollution and the stress of additional traffic and noise pollution).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the amendment to A43, in that it not only fails to reduce the number of homes still proposed (remaining at the disproportionately high number of 400), but it also adds the provision of sites for 'Travelling Show People'.

I object in the strongest possible terms to the impact these recommendations will have on local roads (volume of traffic and addition to the already high level of general and noise pollution), the destruction of greenbelt and the undeniable ruining of the village of Send by placing a disproportionately high burden on Send (why are these housing needs not being more evenly distributed across the borough?) There are also other nearby developments in the Horsley and Clandon areas that means a huge volume of this change will impact a small patch of the borough and the proposed infrastructure changes will not be sufficient - even if they are carried through in every instance, which seems extremely unlikely given the current and future chronic pressures on public funding.

Are residents to be compensated for the destruction of greenbelt, impact on their local services and very likely negative impact on house prices?

The plan should be amended to more evenly share the burden across the borough. The plan should also remove provision of sites for 'Travelling show people' under A43. There is already increasingly heavy traffic traveling through Send accessing the A3 road and Old Woking/Woking. These changes will further impact these roads and negatively impact residents wellbeing (pollution and the stress of additional traffic and noise pollution).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Site A35 Former Wisley Airfield

- Size has increased to 95.9 hectares. Huge impact on the local area with increased congestion and pollution. Nitrous oxide levels already above safe Infra structure is already at saturation point through Ripley at peak hours.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/807</th>
<th>Respondent:</th>
<th>17206433 / Rosalie Hewitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Site A42 Tannery Lane, Send

- Proposed increase from 45 to 60 houses will have a significant impact on the highly congested local rural road network for example, Polesden Lane, Tannery Lane, Papercourt Lane and would impact on Send which is already at saturation point especially during peak hours.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/804</th>
<th>Respondent:</th>
<th>17206433 / Rosalie Hewitt</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I am extremely concerned about the impact these changes will have on the local community and its way of life. Whilst I fully realise that the need for housing is a major concern, I would argue that to construct the volume that is suggested would not only destroy the status quo for local residents but also would have little advantage for the proposed population increase. The area would become a vast conurbation and appendage to Guildford, with unsustainable pressures on the local infrastructure. I list my objection to the proposed changes below:

Site A43 Garlicks Arch.

- Original proposal altered to accommodate a minimum of 400 possibly 650 houses if the proposal to remove the industrial site to Burnt Common goes ahead. This would be extremely harmful to the rural nature of Ripley, Send Marsh and Send causing coalescence of these three villages.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/805  Respondent: 17206433 / Rosalie Hewitt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A58 Burnt Common

- This is a new inclusion of a 9-hectare site for a minimum of light industrial, general industrial, storage and distribution. This is ambiguous and lacks detail
- 6 Travelling show people plots with associated mixed use yards and large storage facilities for equipment which, arguably, would involve storage for fairground rides, with associated articulated lorries, transportation vehicles and permanent residential plots which is the designated formula for 1500-1999 This would be out of scale with the proposed development
- Potential for Waste Management facility briefly mentioned in Policy 4.23a with no proper consultation. The impact on local infrastructure would be immense

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/809  Respondent: 17206657 / Rachel Dearnley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: pslp172/810  Respondent: 17206689 / Hannah Dearnley  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

Comment ID: pslp172/824  Respondent: 17207105 / Caroline Minter  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane - I object to the Policy A42 change at Clockbarn because it will make erosion of the Green Belt in our village worse and the increase to 60 homes in place of 45 homes is 33% more and too much

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/826  Respondent: 17207105 / Caroline Minter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road - I object to Policy A58 at Burnt Common because there is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units. It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/97  Respondent: 17207105 / Caroline Minter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15 - I object to the proposal to inset Send Business Park from the Green Belt because further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

Finally, Sir Paul Beresford (our local MP), was re-elected following the election on 8th June. In his election leaflets, he distinctly said that he would protect our Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/838  Respondent: 17208961 / Aaron Mason  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Councils changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.), which:

- Directs more office space to an extended Business Park (Policy E4), which will increase peak-time congestion, particularly around the Hospital and A&E, and will also encourage rat-running through residential areas.

- Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review. (Para 4.3.8.).

- Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development. (2.14a).

- Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/839  Respondent: 17208993 / F4P (Lorraine Ragosa-Rout)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Councils changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.), which:

- Directs more office space to an extended Business Park (Policy E4), which will increase peak-time congestion, particularly around the Hospital and A&E, and will also encourage rat-running through residential areas. The area is already under tremendous pressure both residentially and by businesses to gain access off the A3 into the research park; it is currently not coping with the traffic; to increase this by another 1800 homes will create collapse.

- Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review. (Para 4.3.8.). A proposed exit off A31 through this area disregards the research that traffic volumes will add to the existing queues and not be beneficial.

- Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development. (2.14a).

- Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).
The traffic at the Egerton Road (Tesco) roundabout, the Royal Surrey County Hospital and Surrey Research Park is already gridlocked at peak hours, and adding thousands more cars to everyone’s rush-hour journey will be detrimental to businesses in the area and the staff who work there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/840  Respondent: 17209025 / Futura Medical plc (James Barder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to raise my serious concerns over the proposed development site at Blackwell Farm. As a long term tenant of the Surrey Research Park and local employer I have seen a steady and continuous increase in traffic onto and off the Research Park resulting in a serious bottleneck on and off the A3 and significant delays for my staff.

I recognise that the council will be under significant pressure to build more housing however and whilst I support such development I do have concerns if it is going to cause significant further congestion without the necessary access infrastructure spending. My understanding is that independent traffic studies echo these concerns and therefore urge an immediate re-think on providing sufficient access to not only address traffic requirements to this new development but the current requirements of both the hospital and research park.

Further congestion and delays with access is likely to result in Futura's relocation from the Research Park and subsequent loss of jobs in the vicinity of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5406  Respondent: 17209601 / Nikki More  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We would like to raise our concerns over the increased amount of traffic that would be added to the already horrendous traffic situation in the area. We already have all the traffic for Tesco’s, The Royal Surrey, The University, The Surrey Sports Park, Park N Ride and the Surrey Research Park. It has taken me personally an hour to travel just 0.4 miles on several occasions in the past couple of years purely down to the volume of traffic that already exists on Gill Avenue and Egerton Road and the surrounding areas at peak hours and adding thousands more cars to everyone’s rush-hour journey will be detrimental to businesses in the area and the staff who work there. I can honestly say I would strongly advise anyone looking for Office space on the Surrey Research Park to think again, purely down to the already horrendous traffic situation.

We object to Guildford Borough Councils changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.), which:

- Directs more office space to an extended Business Park (Policy E4), which will increase peak-time congestion, particularly around the Hospital and A&E, and will also encourage rat-running through residential areas.

- Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review. (Para 4.3.8.).

- Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development. (2.14a).

- Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/850  **Respondent:** 17209665 / Sam Guest  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Dear Sir/Madam,

As an employee on the Surrey Research Park, I write to voice my objections regards Guildford Borough Councils changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.) which:

- Creates more office space on an extended Business Park (Policy E4), which will increase peak-time congestion, particularly around the Hospital and A&E (public safety must be of paramount concern), and will also encourage rat-running through residential areas. Traffic is already incredibly congested in this area and often causes knock on effects backing up onto the A3.

- Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review. (Para 4.3.8.). I strongly believe as someone who works on the business park that a major attraction of being here is the stunning surroundings which would inevitably be eroded by this additional development.

Page 2014 of 2988
- Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development. The road network is not setup to cope with this additional traffic and the plans in place seem wholly inadequate (2.14a).

- Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/851  **Respondent:** 17209729 / Roger William Bakewell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object strongly to the change in the above policy, an increase to 60 homes in place of the original 45.

Whilst I was aware of the above plan for 45 homes, I had not experienced the effect of traffic in Tannery and Papercourt Lanes. These roads are already totally unsuitable for all but the most minimal traffic. They are almost completely single track with no formal passing places other than at the Tannery Industrial units.

The hard standing in front of my bungalow is an 'unofficial' passing place. This morning there was a complete blockage outside with 2 vehicles encroaching on my property in an effort to clear the blockage. The speed limit is regularly exceeded. Recently there was a serious accident at the sharp bend just up from my property. Please note this email may be provided in evidence in any related accident investigation.

It is clear these Lanes are already 'rat' runs for those seeking another route to Woking or the M25.

The increase of homes in the above plan to 60 will increase the possibility of extra cars using these Lanes from 90 to 120, assuming the majority of households have at least 2 cars. This will cause complete chaos.

In addition to not proceeding with this increase in homes, the council should take other traffic reduction/calming measures such a 'access only' stretches.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/852  **Respondent:** 17209761 / Philippa Lawrence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

---

2015

Page 2015 of 2988
**Policy A42 objection**

I am writing to object to the recently revised policy for Clockbarn Nursery on Tannery Lane. The newly proposed development of now 60 homes rather than the previously proposed 45 is too much. It is an uplift of 33% more and ignores all of the previous hundreds of objections raised. Tannery Lane is a very tight lane and the main road onto which it leads is already high with traffic from the neighbouring villages using as a through road to access the A3. The area simply cannot handle the additional traffic such a development would bring with it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/853</th>
<th>Respondent: 17209761 / Philippa Lawrence</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This also leads to my objection of policy A43 and the proposals for the land at Garlicks Arch. Not only does it ignore the thousands of previous objections made, there is no proven demand for traveller plots in this location or for a development of this size in this area. It will cause significant over development of our village and increase the already excessive levels of traffic that already cause huge builds of traffic within both Send and Ripley.

Such proposals simply cannot go ahead. It is damaging the green belt and will cause severe unrest for those residence living in the

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/854</th>
<th>Respondent: 17209793 / Evolve Dynamics (Michael Dewhirst)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.), which:

- Directs more office space to an extended Business Park (Policy E4), which will increase peak-time congestion, particularly around the Hospital and A&E, and will also encourage rat-running through residential areas.

- Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review. (Para 4.3.8.).

- Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development. (2.14a).

- Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is further from railway stations than any other identified strategic site.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
3. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
7. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
8. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
9. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
10. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

11. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

12. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

14. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

15. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

16. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

17. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

18. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

19. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

20. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

21. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

22. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

23. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to the proposed development at the Garlick's Arch site. I object for the following reasons:
- the proposed houses would be on Greenbelt Land
- the potential increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause these villages to merge.
- the inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt. There is no identified need within the Local Plan documentation. The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan and so is out of scale with the proposed development.
- the potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/856  Respondent: 17210145 / Tim Crook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- the potential for a Waste Management Facility at site A58 Burnt Common as briefly mentioned in policy 4.4.23a does not allow for full and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/862  Respondent: 17210177 / Janet Block  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/864  Respondent: 17210657 / Anne Carew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/864  Respondent: 17210657 / Anne Carew  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
An independent traffic study by Traffic Consultant RGP, commissioned by Compton Parish Council, has shown that the proposed new access road from the A31 is economically unviable and will not cope with the volume of traffic using it. In particular, it indicates that a new signalised junction on the Hog’s Back will add to existing morning peak-hour queues along the A31.

The Council’s response to this study has been to try to restrict the volume of traffic using the new route by controlling a section of it, and it has suggested using automatic number plate recognition (ANPR) technology to do this. However, it is unlikely that the local highway authority would allow the use of this technology on any road it adopted. The outcome would be, therefore, that this “controlled” section of the new route would remain a private road, and its funding, upkeep and policing would remain in private hands – a far from reliable solution. It is wholly impractical to control access to an 1800-home development (which includes two schools) in this way, and there is a real risk that this ill-conceived scheme will be abandoned downstream, resulting in traffic chaos at both ends of the new link road.

Any suggestions that tweaking the Egerton Road roundabout or introducing a rail halt at Park Barn would mitigate against the levels of traffic using this new rat run into Guildford are unfounded. The station would only serve those commuting from the Reading direction who are prepared to change their mode of transportation. Furthermore, Highways England’s response to Guildford’s 2016 Local Plan (now withdrawn) calls into question the whole traffic modelling underpinning the Plan. It states:

“The traffic impacts of these proposals could potentially lead to significant detrimental impacts on the A3. Whilst Highways England has a number of significant concerns with the Strategic Highway Assessment modelling evidence base underpinning the Local Plan it does suggest that Scenario 3, which includes the new Blackwell Farm access onto the A31, leads to a worsening of traffic impacts on the SAN.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

IN GENERAL, I OBJECT TO DEVELOPMENTS AROUND SEND, TOGETHER: policies A42, A43, A58

I object to changes to these Policies in the Plan on the grounds:

1) Since 2014, GBC has repeatedly changed its mind on what is appropriate for Send, showing lack of co-ordinated strategy. Again now, it is relentlessly and unfairly targeting the area with developments, regardless of previous objections to these excessive plans.

2) The local “village” services, roads, transport, doctors, etc, barely cope as it is. But, under the Plan the population of Send will increase so much that I think that local services will be “unsustainable”; and that is against the fundamental principles of “proper” planning.
3) The Burnt Common area will become “traffic chaos” in peak hours, having 3 major new developments nearby: a huge new housing estate, industrial park, and new A3 slip-road.

IN PARTICULAR, POLICY A58 – Land at Burnt Common
I object to changes in this particular policy, because:
1) The strongly held view locally is that this development is unnecessary, there being no actual need more warehousing and factory space sited here. But, in particular, I object to its extent being randomly changed from a maximum of 7,000 sq m, to a minimum of 7,000 sq m, that is effectively making it limitless in term of what can be crammed on to it.
2) The development will add to already severe peak-time traffic congestion.
3) If proposed developments to Burpham are also approved, there will be only a narrow strip (about 500m) of Green Belt separating Guildford/Burpham and Send/Ripley contiguous built-up areas. This will be an unacceptable erosion of Green Belt.

IN PARTICULAR, POLICY A43 – Land at Garlick’s Arch
I object to the changes in this policy, because:
1) This development is far too large for the local area to cope with. It will effectively join villages of Send, Send Marsh, and Ripley, to form one contiguous built-up area; forming, within a short time, a new town effectively.
2) I object to space being allotted to accommodate Gypsies and/or Travelling Showpeople in this area. Around here, these are [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/875  Respondent: 17211617 / Philip Ian Kirkpatrick  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/876  Respondent: 17211681 / Andrew Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/877  Respondent: 17211713 / Lewis George Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/878  Respondent: 17211745 / Jillian Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/879  Respondent: 17211873 / Marcus McMahon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/880  **Respondent:** 17212129 / Nanette Lindsay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/881  **Respondent:** 17212161 / H Trigg  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/882    Respondent: 17212225 / J Trigg    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/886    Respondent: 17218177 / Colin Readon    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/889  Respondent: 17218401 / Susan Jane Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/890  Respondent: 17218465 / Alison Wynne Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/899  Respondent: 17219393 / Una Margaret Teal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/900  Respondent: 17219425 / Mr and Mrs Bendiksen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/906  Respondent: 17219681 / Charisse Otty  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/907  Respondent: 17219713 / M. J Forgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/910  Respondent: 17219777 / Mr and Mrs Lamy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/912  Respondent: 17219969 / Senga Foran  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/913  Respondent: 17220001 / G Grafton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/923  Respondent: 17220417 / Peter Mussell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/89  Respondent: 17221025 / Stuart Morgan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the above Policies A42, A43, A58 and Green Belt Policy 2 at paragraph 4.3.15 since I consider any encroachment on Green Belt areas is morally and environmentally wrong - given the Brown Field Sites available in the area (including, for example, most of the vast Wisley Airfield site).

Local Plan 2017 is a clear failure of the proper planning process which was the basis of all the tens of thousands of objections to it in its previous guise of Local Plan 2016. However, local Plan 2017 has ignored all those earlier objections and proceeded with even worse schemes, bearing in mind the clearly inadequate surrounding social infrastructure and road links.

Please desist from wasting tax payers' money on such pointless anti-social planning exercise and listen to the wishes of those tax payers in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/941  Respondent: 17221377 / Mr S Sinai  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
As residents of Burnt Common our area has been threatened with irreversible and excessive development on all sides completely destroying what is left of our rural landscape. I object to policy a42 change at clock barn in Tannery Lane because; there has been a 33% increase in planned new homes from 45 to 60 ignoring hundreds of previous objections and adding to traffic congestion at the a247 junction. Contributing to increased surfaced water flooding which already exists. It will impact on the countryside surrounding the river wey navigation and it is greenbelt land which should not be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We wish to object to the inclusion of Blackwell Farm as a development site.

The area merits AONB status according to the independent landscape study you are aware of.

Traffic is already a massive problem on the A3 around the hospital especially but not only at peak times. The development will add to this congestion unnecessarily, and spread it to nearby residential areas. This ignores independent expert traffic studies of which you are also aware. Air pollution in nearby areas already exceeds EU safe limits with implications you well know for the health of children especially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I wish to object to the development of 1800 homes at Blackwell Farm, on land which is an Area of Outstanding Natural Beauty. Also part of the land is in the Green Belt which must be preserved for future generations. A recent land evaluation has assessed Blackwell Farm as being outstandingly beautiful that merited its inclusion in the AONB and as such it should remain undeveloped.

The existing road network between the Research Park and the A3 is already heavily congested and cannot take the increase in traffic volume which would be caused by this development.

The existing road infrastructure which already serves the Research Park, the Hospital, the Sports Park, the University, Tesco and Park Barn would need to be increased in capacity, which would appear to be a physical impossibility.

If the vehicular access via Down Place is to be used, then additional traffic will cause chaos on the A31 which is already heavily congested. Until Highways England have issued their proposals for improvements to the A3, A31 and road junctions which serve Guildford then no further consideration should be given to the development at Blackwell Farm. The housing developments in Ash will mean that more traffic will use the A31 and A323, so this will cause, cumulatively, severe transport problems on roads to the west of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/958  **Respondent:** 17227137 / Dophin Networks (Andy Taylor)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

We object to Guildford Borough Councils changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.), which:

- Directs more office space to an extended Business Park (Policy E4), which will increase peak-time congestion, particularly around the Hospital and A&E, and will also encourage rat-running through residential areas.
- Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review. (Para 4.3.8.).
- Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development. (2.14a).
- Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/970  Respondent: 17227585 / Helen Barton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/971  Respondent: 17227617 / David Buisson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/973  Respondent: 17227649 / Joan Kennedy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/976  Respondent: 17227713 / J.E Reynolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/977   Respondent: 17227745 / Mary Mounsey   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/978   Respondent: 17227841 / Simon Eedward Mann   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/981  Respondent:  17227937 / John Dewar  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/982  Respondent:  17227969 / Jeremy Garson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/984  Respondent: 17228001 / Patricia Garson  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/983  Respondent: 17228033 / Irena E Padol  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/985</th>
<th>Respondent: 17228065 / Barry Woodger</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/987</th>
<th>Respondent: 17228129 / Evelyn Gaff</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/988  Respondent: 17228193 / Sarah Horsley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/989  Respondent: 17228385 / Patricia Ann Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

| Comment ID: | pslp172/990  | Respondent: | 17228545 / Denis Parnel  | Agent: |
|-------------|--------------|--------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( )  | is Sound? | ( )  | is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

| Comment ID: | pslp172/991  | Respondent: | 17228641 / Emma C. Parnell  | Agent: |
|-------------|--------------|--------------|---------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( )  | is Sound? | ( )  | is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident in Ripley, I **object** to the new local plan put forward by Guildford Council, which are: Site A43 Garlicks Arch, Site A58 Burt Common and Site A42 Tannery Lane. I strongly believe that the plans put forward will be difficult to complete as they are unrealistic and inconsiderate.

First of all, the increase in housing numbers from 45 to 60 at Site people in Tannery Lane will have use Polesdon Lane to get to Ripley high street, as well as Woking, and the A3. Using these roads every single day, I can clearly state that Ripley and its little lanes are already majorly crowded, unable to take two-way traffic, which is dangerous as cars are already driving on pavements, putting pedestrians in danger. Also, this means that children walking and playing are endangered.

Secondly, the creation of an industrial zone and waste management within a small village seems extremely inconceivable given that this can only lead to further increased traffic, likely to be trucks, in a small residential village. This goes back to my previous comment about the safety of residents.

Finally, the inclusion of 6 x Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Greenbelt. The allocation of these plots [Response has been reacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] would affect the current residents who, some, have been here for years.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1039  Respondent: 17234689 / Joanna Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1040  Respondent: 17234753 / D Foster  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1041  Respondent: 17234785 / Andrew Lixten  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1042  Respondent: 17234817 / Tracy Arrow  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1043  
Respondent: 17234849 / Nicholas Paul Greaves  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1044  
Respondent: 17234881 / Watson Failes  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1045  Respondent: 17234913 / Jane Hilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1046  Respondent: 17234977 / Tim Chilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1047</th>
<th>Respondent:</th>
<th>17235009 / Philip-Marina Butler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1048</th>
<th>Respondent:</th>
<th>17235041 / Marie Benson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1049  Respondent: 17235073 / John Benson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1050  Respondent: 17235105 / Carol Perry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1052</th>
<th>Respondent:</th>
<th>17235169 / Pamela and Robert Snare</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1053</th>
<th>Respondent:</th>
<th>17235233 / Joanne Harvey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2072 of 2988
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1054  Respondent: 17235297 / Raymond John White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1056  Respondent: 17235329 / Philip Airey  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1057  Respondent: 17235457 / Rick Kimber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1058  Respondent: 17235553 / John Herey Brown Froggett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2074 of 2988
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1059</th>
<th>Respondent:</th>
<th>17235585 / Frances Chilton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1060</th>
<th>Respondent:</th>
<th>17235617 / Jack Perry</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1061  Respondent:  17235681 / JOYLE INGLESANT  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1062  Respondent:  17235873 / Tracy Dorey  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceeds safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/93   Respondent: 17240193 / Anita Aptel   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/94   Respondent: 17240193 / Anita Aptel   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be
developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far
more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/169  Respondent: 17240193 / Anita Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the
Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at
Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further
development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/170  Respondent: 17240193 / Anita Aptel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified
villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses,
which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ
dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will
result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as in Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: pslp171/190</th>
<th>Respondent: 17240961 / Jan Benton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In view of flawed new evidence, Guildford's plan to build 12,426 new homes is excessive and will result in the loss of green belt and green spaces, and also increased congestion. Guildford needs homes in the centre which would not add to congestion on already very busy roads. Guildford doesn't need more shops but flats and houses instead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

---

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1098</th>
<th>Respondent: 17241889 / John Hackney</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to "have adopted a ‘brownfield first’ approach" (page 5) but this is clearly not the case, and is contrary to national guidelines.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

---

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1097</th>
<th>Respondent: 17241889 / John Hackney</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---
<table>
<thead>
<tr>
<th>Comment ID: pslp172/1100</th>
<th>Respondent: 17241889 / John Hackney</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1092</th>
<th>Respondent: 17241889 / John Hackney</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlick’s Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1094  Respondent: 17241889 / John Hackney  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the hiding of development by “deferment” (A24, A25, A26, A43)

   This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
   i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
   ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1096  Respondent: 17241889 / John Hackney  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1095  Respondent: 17241889 / John Hackney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1093  Respondent: 17241889 / John Hackney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50
The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

I object to the proposal for a Waste Management Facility in Green Belt (A58)
The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the proposal for a Waste Management Facility in Green Belt (A58)
The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make anegotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1109  Respondent: 17242369 / Denise Elizabeth Roberts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1111  Respondent: 17242593 / D.C Murrell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1112  Respondent: 17242625 / Mrs Josephine M. Waldron  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1113  Respondent: 17242657 / Angus Lyon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: pslp172/1114  Respondent: 17242689 / Rachael Hayman  Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: pslp172/1115  Respondent: 17242721 / Oliver Steel  Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1116  Respondent: 17242753 / Louise Glaysher  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1117  Respondent: 17242785 / Lorraine Frances Gould  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Amendments have been made to the policy’s allocation, requirements, and opportunities. However, there has been a failure to mention a bespoke SANG which is a key requirement for the scheme to deliver.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3985  Respondent: 17243169 / RSPB (Chloe Rose)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy associated with the allocation of the site for 2,000 houses has not significantly changed (beyond minor grammatical issues). However, the Wisley allocation refers to a bespoke SANG to mitigate rather than avoid adverse effects on the SPA, this wording is inconsistence when comparing the general policy within the Plan (P5) and this specific policy. Policy A35 is not setting out the correct tests, and is inconsistent with Policy P5’s approach which seeks to adequately to avoid impacts on the SPA via a properly located and designed SANG. From our understanding of the proposals that have currently been brought forward, we do not consider that the SANG is adequately designed to avoid adverse impacts on the SPA, in particular because the extant rights of way on the site are likely to funnel residents from the housing and into the SPA. The RSPB therefore still remains concerned that policy P5 has not been properly implemented in relation to this specific allocation, a concern detailed in our response to the ‘Proposed Submission Local Plan: strategy and sites’ consultation.

The RSPB note with concern that all 8 of the “reasonable spatial strategy alternatives” considered by the Plan’s Sustainability Appraisal contain a proposal for 2000 houses at Wisley (page 36). The RSPB does not consider that this represents an appropriate consideration of alternative strategies insofar as this policy is concerned. This approach makes it impossible to consider the comparative sustainability of the site against other possible strategies. This has an important bearing on the overall soundness of the Plan. Paragraph 182 of the National Planning Policy Framework requires that for a plan to be justified it “should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”. We consider that the failure to consider any plan scenario which does not contain Allocation A35 fails to satisfy the requirements of this test: there are clearly alternative sites and approaches that could have been adopted (highlighted by the number of sites that the Council has considered throughout the production of the Plan) but the Council has ultimately declined to demonstrate a clear need for the Wisley airfield site. If the Council had presented scenarios here with and without the Wisley airfield site it would have been possible to consider the comparative merits of the alternative sites and approaches, but instead the Council has considered no alternatives for such a substantial proportion (16.1%) of the Council’s housing allocations, and one that will have an array of significant implications arising from its inclusion in the Plan. The RSPB consider that in order to make the Plan sound it is essential that it assesses alternative scenarios which do not include the Wisley airfield site.
A further important consideration is that if technical problems prevent the delivery of the Wisley airfield site the Council does not have an alternative solution to help it meet its housing requirements, raising questions about whether the plan is effective over its period.

The RSPB considers that there are inherent inconsistencies between the stated aims of the Plan and the inclusion of the former Wisley airfield which are central to the overall soundness of the Plan. The Foreword to the Plan states that:

“It also outlines how we will conserve and enhance the unique qualities of our natural and built environment, especially in the Surrey Hills Area of Outstanding Natural Beauty and Thames Basin Heaths Special Protection Area. This Development Plan Document sets out how we propose to meet these conflicting demands” (p5).5

The Foreword continues:

“Whilst we will conserve and enhance our special landscapes, the Local Plan aims to balance protecting the borough’s unique environment with meeting our social and economic needs.”

The RSPB submits that this statement gives a clear expectation that protection will be accorded a higher priority than development in circumstances where there are conflicts between the need to provide housing and the need to protect nature conservation interests. A key factor is that existing protected areas must be conserved in situ, whereas there is greater flexibility to decide where future housing allocations will go.

The RSPB notes Strategic Objective 6 of the Plan: “To protect those areas designated as Thames Basin Heaths Special Protection Area, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty for their biodiversity and landscape characteristics.” In addition we note Strategic Objective 7: “To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates and is adapted for, climate change.” All of Strategic Objective 6, and the first part of Strategic Objective 7, are pertinent to the proposed allocation of the former Wisley airfield. The RSPB consider that the inclusion of the former Wisley airfield represents a clear failure by the Council to meet its requirement to conserve its internationally designated areas and has placed development demands first, and is a failure to meet the strategic objectives it has set itself. These clear internal inconsistencies demonstrate that the Plan is not the most appropriate when considered against reasonable alternatives and that the Plan consequently fails the “justified” test of Soundness.

The RSPB notes that policy S1, Presumption in favour of sustainable development, states:

“We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental considerations in the area.”

However, this does not mean that it will be possible to find appropriate solutions to allow the development to go ahead.

We note that the supporting Policy P2, Green Belt, states that “If major previously developed sites are of sufficient scale and do not possess an open character, it is not considered necessary for them to remain within the Green Belt.” (para 4.3.14). However, a visit to the former Wisley airfield clearly indicates that, aside from a runway and adjoining apron that the site is clearly open in character, a fact borne out that the first reason given by the Planning Officer’s report into the Wisley application recommended refusal for the “clear and substantial detrimental impact on the openness of the Green Belt” (Officers’ Report, para 2.1).

The RSPB’s concerns with the site

We highlight here the key concerns which we raised on the rejected planning application for the former Wisley airfield, that we consider are central to the inclusion of the site as an allocation in the Local Plan. We focus on concerns we raised about the general suitability of the site, as we consider that these are so fundamental to the site that they cannot be resolved by the promotion of an alternative development scheme on the site.

6 The RSPB highlighted that “the location of the SANG between the development and the SPA will actually draw people towards the SPA and would end up simply providing new residents with a route to the SPA. Clearly, this defeats the object of providing a SANG.” (RSPB objection letter, 25 March 2015)

We further stated:
“Whilst we understand the developer’s desire to locate the SANG in the 400m zone as built development is highly unlikely to be permitted we consider that the constraints this has on its design is likely to introduce pinch-points and compromise the SANG’s effectiveness.” (RSPB objection letter, 25 March 2015)

Finally the RSPB stated:

“The RSPB’s view is that the existing PROW [Public Rights of Way] fundamentally and unavoidably compromise the functionality of the SANG as an avoidance measure.” (RSPB objection letter, 12 February 2016)

It is important to note that as a result of the multiple rights of way run right across the whole development site and into the SPA, providing ready access to the SPA to residents of any housing scheme that is constructed on this site, it is our view that no housing allocation is appropriate in this location.

As set out above in relation to our concerns about the rejected scheme, we do not consider it likely that a project level assessment will be able to adequately exclude the risk of harm to the Special Protection Area, as we do not believe a SANG at this development site can be effective in drawing residents away from the SPA as a result of the Public rights of way network on the site. As this information is already known and was available to the authors of the HRA we consider it inappropriate to rely upon such an approach here – the issues of concern are ones which are not capable of being resolved at the application level. Part of the role of the HRA of the Plan should be to evaluate the likelihood that a project-level assessment can be passed – helping to give a clear understanding of the likely deliverability of key sites: the former Wisley airfield is expected to deliver 16.1% of the Borough’s overall housing until 2034 – so it is essential that any risks to such a site coming forward should be clearly evaluated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3986   Respondent: 17243169 / RSPB (Chloe Rose)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The RSPB notes the removal of Policy A46 for a significant allocation of 1,100 houses. We note that this site lies approximately 750m away from the SPA, with the southern end of the site lying approximately 2000m from the SPA. The RSPB has been unable to identify the reasons why this site has been removed and the allocation of Wisley airfield has been retained. Without this information we consider, when linked to our concerns about the approach to assessing alternatives highlighted in relation to allocation A35, that the plan is not sound, as it is not justified – there is no evidence to demonstrate that the strategy that the Council has adopted is the most appropriate one when considered against reasonable alternatives.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2056   Respondent: 17243169 / RSPB (Chloe Rose)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3
Sustainable transport for new developments
Paragraph 4.6.20: The RSPB support the inclusion of the requirement that developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However, the RSPB is concerned that the proposed development at the Wisley airfield is not consistent with this policy due to its relatively remote location, away from established employment and service opportunities and lack of adequate public transport connections.

It is important that the impact of the proposed improvements to the M25/A3 Junction should be considered in combination with likely impacts of the Wisley Airfield scheme. These improvements are anticipated to have an adverse effect on the SPA and it is essential that the impacts of the Wisley Airfield scheme are considered in combination with this road scheme.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2053   Respondent: 17243169 / RSPB (Chloe Rose)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thames Basin Heaths Special Protection Areas

The RSPB welcomes the addition of the references to “avoidance” within Policy P5. We consider that the Policy is sound. 4.3.50a – The RSPB welcomes the new text proposed here.

4.3.51 and 4.3.54: The RSPB notes that these paragraphs contain some uncertainty about whether student accommodation is required to provide SANG and SAMM. This uncertainty appears to be down to the last two sentences of paragraph 5.3.54. We recommend revising that the text is amended to read “The need for student accommodation and other permanent accommodation, and other types of permanent accommodation not listed in paragraph 4.3.51, to provide SANG will be assessed on a case by case basis: it will be the responsibility of the scheme promoter to provide information through a Habitats Regulations Assessment that demonstrates that SANG are not required for that particular development because its residents will not cause a net increase in recreational pressure upon the SPA.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

5.3.54 should be amended to read “The need for student accommodation and other permanent accommodation, and other types of permanent accommodation not listed in paragraph 4.3.51, to provide SANG will be assessed on a case by case basis: it will be the responsibility of the scheme promoter to provide information through a Habitats Regulations Assessment that demonstrates that SANG are not required for that particular development because its residents will not cause a net increase in recreational pressure upon the SPA.”
Presumption in favour of sustainable development 4.1.4 – The RSPB agrees with the proposed amendments and consider that these helpful clarifications help make the Plan sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Legal Compliance
The RSPB does not consider that the document is legally compliant. The plan can only be adopted if the Council is able, on the basis of all the evidence available, to conclude that the Plan will avoid an adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (or any other Special Protection Area (SPA) or Special Area of Conservation(SAC)), as required by The Conservation of Habitats and Species Regulations 2010 (as amended).

The RSPB has already highlighted, in its objection to the recent planning application for the redevelopment of the Wisley Airfield, that it is profoundly concerned about the potential impacts of residential development at this location upon the Thames Basin Heaths Special Protection Area (TBHSPA). We highlighted that we did not consider that it would be possible for the proposed mitigation measures to overcome the impacts upon the TBHSPA. The key point is that the plan cannot be considered legally compliant if it includes a potentially harmful allocation.

In order to make the plan legally compliant we consider that the inclusion of the Wisley Airfield site must be dropped – it is only if this is done that it will be possible for an assessment under the Conservation of Habitats and Species Regulations 2010 (as amended) to conclude that the delivery of the plan will avoid harm to the Thames Basin Heaths Special Protection Area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp17q/378  Respondent: 17243169 / RSPB (Chloe Rose)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

**Soundness**

The RSPB considers that the proposed submission local plan is not sound. We consider that there are problems with 3 of the tests of soundness. We do not consider that the plan is justified, in particular we do not consider that the inclusion of Wisley Airfield as a new settlement represents the most appropriate strategy when considered against reasonable alternatives.

We do not consider that the Wisley Airfield aspect of the plan is deliverable, particularly as a scheme very similar to that proposed in the Plan has recently been refused by the Council on a number of grounds which are unlikely to resolvable, and that consequently the plan is not effective: in particular, the reliance upon this particular site to provide 16.1% of the Borough’s 2034 housing figure places the delivery of the overall housing target at risk.

We also note that national policy (in particular paragraphs 117 to 119 of the National Planning Policy Framework) highlight the importance of ensuring effective protection of internationally important wildlife sites through the local plan process but consider that the inclusion of the Wisley Airfield proposal runs counter to that policy direction, meaning that the plan is not consistent with national policy.

In order to make the plan sound the proposed Wisley Airfield site allocation (and its associated references) needs to be removed from the plan.

This will make the plan consistent with national policy by respecting the policy and legislative safeguards accorded to the Thames Basin Heaths Special Protection Area, remove uncertainties about the delivery of a large proportion of the housing, and remove an inappropriate settlement proposal from the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1119  Respondent: 17243201 / Rosemary Stacey  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1127  Respondent: 17243585 / Anthony Mintern  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1129  Respondent: 17243649 / Niel & Jane Smith  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1137  Respondent: 17243873 / David Thorpe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1139  Respondent: 17244001 / June Marie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of land at Garlick's Arch. It is subject to flooding, contains ancient woodlands—over 80 oak trees. It is a habitat for wildlife. Have not seen any wildlife report in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/219  Respondent: 17244001 / June Marie  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that the north east corner of the borough is being proposed for these large developments. The plan is unbalanced. 36% of the development is proposed in Wisley/Ripley/Send (A43) and Clandon (A25). At present these villages make up only 11% existing housing. I object to the new figure of 693 houses required per annum. the council has not published the SHMA report so these figures cannot be verified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1142  Respondent: 17244097 / David bakerville  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2770  Respondent: 17244321 / James Odell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support In Full Good News for Home Buyers. We need new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/225  Respondent: 17244481 / Graham Hardy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

First, the New Plan would appear to be based upon flawed evidence and assumptions in respect of likely population growth over the life of the Plan. This overestimate of as much as 40%, consequent upon the inclusion of transitory students who leave at the end of their studies, results in a totally unrealistic and excessive figure for housing provision (that is not to say that there should not be appropriate student accommodation in and around the University campus). If the proposal for more than 12,500 homes is adopted (plus the buffer of a further 1,000 plus houses) the consequent developments will result in needless loss of the Green Belt, huge stress upon resources, including water & sewage treatment and a profound and utterly unacceptable increase in traffic volumes and resultant congestion.
I therefore object to the 2017 New Local Plan on the basis that it proposes excessive and totally unnecessary housing numbers for Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1179  Respondent: 17244513 / Gail Naughton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1178  Respondent: 17244545 / Daphne Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1177  
**Respondent:** 17244609 / Andrew Civil  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire):* ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1175  
**Respondent:** 17244641 / Lisa Tufnell  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire):* ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy A58 at Burnt common because....

It was deleted from the 2014 draft because of all the objections made previously the word Minimum is a change from the previous Maximum in the 2016 plan. There is no need to build industrial or warehouse development in the middle of green belt when Slyfield and Guildford still have plenty of sites and industrial units. The lorries and excess traffic will turn our roads into main noisy access roads.

It will join up existing villages and defeat the purpose of GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp17q/34  Respondent: 17246657 / MADDOX (Matt Hill)  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

For a plan to be considered sound, paragraph 182 sets outs that it must be:
- Positively prepared – the plan must be prepared and based on a strategy which seeks to meet objectively assessed requirements and where it is consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on appropriate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Taking the above into consideration, we consider the Plan as a whole meets the test of soundness as set out within paragraph 182 of the National Planning Policy Framework.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/238  Respondent: 17246945 / C Kurk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Having read your revised plan it appears that the only thing to happen is a very slight drop in number of new homes proposed.

It still does not take into account lack of school places and medical appointments which are already at breaking point.

The infrastructure cannot take the amount of extra traffic proposed. Parking is already a problem let alone moving round in the area.

To put houses on at Wisley and to get them coming on at Ripley is total madness.

Junction 10 on the M25 is a black spot and very often is blocked as is the A3. The A3 has become due to volume of traffic just like the M25.

We pass over the M25 nearly every day and it is always stuck and not moving one way or the other.

Trying to bring more traffic on at this junction seems a very bad idea, the whole of the area will grind to a halt.

Perhaps some of the land around Guildford would be a better idea. Shalford for instance has lots of areas which could be built on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Ref sites A46 and A47:

As residents of Normandy we are very relieved to see that sites A46 and A47 are no longer earmarked for large scale development in the new Local Plan.

The effect on the Village of Normandy would have been a near disaster, not only the influx of hundreds of people, but on the lack of local infrastructure and the geology of this area north of the Hogs Back.

We acknowledge that the large scale developments in the neighbouring Rushmoor area with the creation of the "New Town of Wellesley", and proposed developments in Tongham and Ash will affect the traffic on our already overcrowded roads d re peased that Normandy wifi not add further to this problem.

This year alone we have seen the chaos wi ou oc1 roads created vh the recent closure of the Hogs Back after the heatwave, and before that the increased traffic incurred during the weekend closures of the M3 motorway.

It is important to the environment to uphold Green Belt areas around Normandy. We have many species of fauna and flora which re! , on th "natural corridors" that are in Normandy to exist and prosper.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1197  
Respondent: 17247105 / Brian & Sandra Grainger  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ref sites A46 and A47

As residents of Normandy we are very relieved to see that sites A46 and A47 are no longer earmarked for large scale development in the new Local Plan. The effect on the Village of Normandy would have been a near disaster, not only the influx of hundreds of people, but on the lack of local infrastructure and the geology of this area north of the Hogs Back. We acknowledge that the large scale developments in the neighbouring Rushmoor area with the creation of the "New Town of Wellesley", and proposed developments in Tongham and Ash will affect the traffic on our already overcrowded roads d e peased that Normandy wifi not add further to this problem. This year alone we have seen the chaos wi ou oc l roads created vh the recent closure of the Hogs Back after the heatwave, and before that the increased traffic incurred during the weekend closures of the M3 motorway.

It is important to the environment to uphold Green Belt areas around Normandy. We have many species of fauna and flora which rely, on the "natural corridors" that are in Normandy to exist and prosper.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/114  
Respondent: 17247169 / Ben Greaves  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the unfair imbalance of the Plan across the borough. With the removal of site 446 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1205  Respondent: 17247169 / Ben Greaves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan
Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail - thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1208  Respondent: 17247169 / Ben Greaves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)
This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays. " And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/1201  Respondent: 17247169 / Ben Greaves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)
I object to Garlick's Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick's Arch
The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick's Arch
The potential of an increase from 400 houses at site A43 (Garlick's Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick's Arch
GBC's own reasons for including Garlick's Arch A43 in the 2016 version were
a) The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation 425) [ than the Burnt Common site did ]”
b) The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1206  Respondent: 17247169 / Ben Greaves  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to removal of Brownfield site (A34) from the Plan. Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council's claims to "have adopted a 'brownfield first' approach" (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1202  Respondent: 17247169 / Ben Greaves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan is self-inconsistent in respect of traveller sites. A50 Whittles Drive, Normandy, shows on the Site details: "Allocation: The site is allocated for approximately 14 Travelling Showpeople plots..." Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no "need" exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1204  Respondent: 17247169 / Ben Greaves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the "required" industrial space is available there, so there is no reason for Garlick's Arch to be included.

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/269</th>
<th>Respondent: 17247169 / Ben Greaves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by "deferment" (A24,A25, A26, A43)
This version of the Plan has concealed some development planned to take place by "deferring" it beyond the period covered by the Local Plan. This is designed to have 2 effects:
i) to hide the number of housed actually being built (A24, A25, A26 - total of 1100 deferred, but still being built!), and
ii) give an excuse for building houses on another site (A43 - 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/266</th>
<th>Respondent: 17247169 / Ben Greaves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)
The previous version of the plan stated that "Developers will be expected to provide land for affordable homes at nil value".

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site."

So the developer doesn't even have to provide any 'affordable' homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these 'affordable' homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) "In general, a need to make profit over and above the standard developer's profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/268</th>
<th>Respondent: 17247169 / Ben Greaves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (443 and 442)
The Foreword to the plan by Paul Spooner includes on page 5: "We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan".

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garklicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/267</th>
<th>Respondent: 17247169 / Ben Greaves</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it's insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no "exceptional circumstances", as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1273  Respondent: 17248513 / Mary Thorburn  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1269  Respondent: 17248545 / Joan Margaret Beer  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

And in relation to Sites A36-41:

- The changes to the Local Plan for East and West Horsley are minimal - the revised plan still contains four of these sites, which represent a total of 395 new dwellings. This shows that GBC has chosen to disregard the very high number of serious objections previously submitted to this part of the plan. **We do not want the character of the Horsleys destroyed by insetting from the Green Belt and over-development.**
- Many Horsley residents are suspicious of political bias amongst a Council leadership which represents the opposite (western) end of the borough: the over-development of East and West Horsley seems to be the sacrifice they are willing to make in order to protect their own neighbourhoods.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Therefore, for the following reasons, we still object strongly to proposals for sites A37-40:

- The issue of excessive and disproportionate development in East and West Horsley compared with the rest of the borough remains unexplained and unaddressed.
- The Local Plan makes no attempt to set out an integrated vision for this part of the borough, there is no assessment of the cumulative impact on facilities and infrastructure - public transport, traffic, road safety, parking, schools, medical facilities, sewage, flooding/surface drainage and shops - of the four sites now proposed, as well as Site A35 (Three Farms Meadow, aka “Wisley Airfield”), which is only two miles away and proposes more than 2,000 new homes.
- Sites proposed on the periphery of existing residential areas in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries and the inserting of the villages from the Green Belt. The plan presents no arguments for this, and contrary to NPPF paragraph 79, will contribute to creeping urbanisation by weakening the Green Belt corridors separating the Horsleys from neighbouring villages.
- Together, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value, which has been an outstanding success story in the Horsleys (as detailed in response to the last consultation). Assets include a dense network of public rights of way and permissive access routes, parks, sports fields, a campsite of international standard, Britain’s newest opera house, and the much-used Olympic cycle route. These examples depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. The proposed developments are clearly in contradiction to this.
- The density of the proposed new housing is inappropriate, being greater than anywhere in East and West Horsley at the current time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/278  Respondent: 17248705 / Sarah & Ray Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The level of investment proposed in the plan seems unlikely to meet the already serious deficiencies in infrastructure across the borough, and where significant investment is specified in the Infrastructure Schedule, in many cases it is unclear whether public sector funding is going to become available to support it. Funding from developers for major infrastructure projects will is unlikely to be sufficient, but until such infrastructure is in place, many of the larger developments proposed in the Local Plan will be unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Despite having a revised Green Belt policy P2 in the Local Plan which states that, “The Metropolitan Green Belt will continue to be protected”, GBC proposes to remove large swathes of land from the Green Belt for use as housing to meet these flawed targets. 56.7% of all new development in the borough will be built on Green Belt sites, with no exceptional circumstances or any other justification given. This is contrary to ministerial guidance and Planning Inspectorate decisions which continue to support the position that unfulfilled housing need does not constitute the exceptional circumstances needed to justify building on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Like most local residents, and as detailed by both Parish Councils, we believe that the conclusions of the revised SHMA are still seriously flawed, and therefore, the proposal to build 12,426 new homes in the borough remains excessively high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1232  Respondent: 17248865 / Jeniffer Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1245  Respondent: 17249217 / David L. Hall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A42 Clockbarn Nursery, Tannery Lane.

Reasons for objection to the proposals of 2016 are well documented and remain valid. An increase of a further 15 houses in addition to the original 45, representing a 33.3% increase is completely unjustified and can only exacerbate further, an already deleterious situation in the immediate locale. In addition it will contribute to worsening the situation at the A247 junction with the London Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1265  Respondent: 17249217 / David L. Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 Garlick’s Arch –Send Marsh, Burnt Common and Ripley

Again, the many thousands of objections to the proposed development in the 2016 Consultation have been completely ignored with respect to this Green Belt land.

Now 8 Pitches/Plots for ‘Travelling/Showpeople have been added to the original 400 houses, without any proven demand or requirement.

There has not been any visible consideration given to the infrastructure which would be required to support this type of expansion. This proposal is impractical.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1267  Respondent: 17249217 / David L. Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A58 Land at Burnt Common, London Road.

This proposal to develop some 7000 Sq.m of Green Belt land for Light Industrial or Warehouse usage was removed from the 2014 proposal because of the vast number of objection. It has resurfaced and the original word **Maximum** which refers to the figure of 7000 in the 2016 proposal has been replaced by the word **Minimum**. This change leaves this area open to even further development at a later stage.

Further development here is totally unnecessary since both Slyfield and Guilford have empty sites and Industrial Units available.

The impact of this proposed development would be severe on the local road network and would cause potential ‘Gridlock’.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1258</th>
<th>Respondent:</th>
<th>17249601 / Penelope Moore</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A34</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1254</th>
<th>Respondent:</th>
<th>17249601 / Penelope Moore</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   a) The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

   b) The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

   c) The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

   d) The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

   e) The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

   f) The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1255  Respondent: 17249601 / Penelope Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There appear to be no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.
Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/1256 **Respondent:** 17249601 / Penelope Moore **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become **even more** biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are **within 3 miles of Send Marsh**, most of them on Green Belt. This is **grossly unfair** on an already overcrowded part of the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/1260 **Respondent:** 17249601 / Penelope Moore **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “**Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...**” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!) , and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/304  Respondent: 17249601 / Penelope Moore  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1287  Respondent: 17250977 / Stephen Clennell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Wisley Airfield potential development.

Essentially this is for 2,100 homes, shops a small school, and business areas.

East Horsley is now considered as an 'Urban Village' - with 4,300 people approx.

The Wisley project - with its 2,100 homes equates to 5,250 people of which (15%) - 800 will be at school - must therefore be considered as a small New Town.

At the moment the SW corner of the site floods - and the SCC attempt to control it - but have they? Get a bit of rain and there is the flood again.....but with a new town of which probably 25% is concrete where is all the water going to go then?

Also....with 2,100 houses we are probably talking about 4,000 cars + another 500 of people coming into the development each day....and all these vehicles are going to be funneled down to the round-about at Ockham Road North and its junction with the A3. Result permanent gridlock.

When I went to school we had up to 40 people per class.....and I see that the developers have planned for 6 classes (I assume a form is a class as it was in my day). OK – so where are the other 680 students going to school? Remember they are across 12 age groups so we are talking which is something like 24 further forms/classes required.

Has anyone at GBC really thought this through?

We can then turn our attention to the flora and fauna of the area. In the woodland known as the Forest alongside the Drift in East Horsley SWT have ripped out an area of low trees and thicket that surrounded a rather hidden pond. There used to be rabbits there, wrens, blue tits, black caps, tree creepers, wood-peckers as well as all the other birds of the woodland….but they are all gone. Who will care if SWT does not care?

And so what will happen to all the flora and fauna of the Wisley Airfield….an area that has largely remained quiet and untouched since the war….I plead on their behalf...."Where will we go?"

So what about this development – caged in by the A3, a B road and a couple of lanes. There is no infrastructure. Roads, Sewers, no parking at the two local train stations, buses…well, they may put some routes in but they will be clogged up too. In addition the permanent white noise of the A3 and the M25…..and yet another area of open space is sucked up!

And lets face it….who will snap up these houses?

They will be sold in the main to people who are escaping London, but still work in the city….they will not be for local people who cannot afford a deposit….but still need a decent home.

I think that GBC needs to throw-out all the PR companies and Consultants, who will sell you the concept that black is white. I know this is true because all my business life I have used these type of people to sell the impossible for me. Get rid of them.

Start again GBC – with the whole of your local plan and start using your individual intelligence.

Blue-Sky thinking is what you need…it is not Rocket Science…its easy….all you have to do is speak up, forget kow-towing to your boss because you are frightened of loosing your pension, speak up, speak load and talk some sense.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp173/126  **Respondent:** 17251169 / Liz Drew  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I am writing to object to the Guildford Local Plan. I have visited an open event at East Horsley village hall and seen the changes proposed.

My key objections are:-

Overall numbers of houses required are still too high. With Brexit and the economic uncertainty we do not require these high number of houses.

The movement of the boundary of the greenbelt around Horsley has no justification - as highlighted by East Horsley Village Council letter on the local plan.

The site at Wisley remains in the plan but you have removed other sites. I object to the building of homes at Wisley Airfield.

There are no meaningful infrastructure investment to accompany the proposed developments in the plan.

Overall I add my support to the letter written by East Horsley Village Council on this matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/308  **Respondent:** 17251585 / Paul Reynolds  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation, is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) but does not go far enough in reducing the still very large number of new dwellings proposed on Green Belt.

1. The eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt
2. It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford

1. Nothing has been put forward since last year’s Consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements. Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel.

2. Flawed evidence continues to be relied upon to justify overexpansion.
3. Guildford town centre needs more apartment homes NOT more shopping space. Online retailing is driving major change in ways of shopping – many reports published stating this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1299  Respondent: 17252993 / Christopher Twin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have some serious reservations and must protest at the proposed plans to expand the area of the Surrey Research Park and Blackwell Farm.

I commute into the Surrey Research Park from Hampshire, proceeding north up the A3 into the Guildford area, and have had enough of the current situation, let alone any future negative impact caused by further development in the area.

Just today I have been witness to a number of potential incidents that are already not being addressed. These observations typically include, but are not limited to:

- The Tesco's roundabout junction coming off the A3. I've seen wing mirrors ripped off and bumpers scraped of the cars that have to sit half and half on the A3 because the slip road is static and filled with traffic.
- The junction coming off the Tesco's roundabout to proceed west on Egerton Road where the outside lane of cars continuously cut up those on the inside, but do so on the very exit of the roundabout which is exceedingly dangerous. This part should be widened or the priority of lanes needs addressing.
- At this same junction there have been accidents involving pedestrians trying to cross where it is exceedingly busy. Either remove the possibility of crossing or provide a safer means for pedestrians to cross by way of bridge or underpass.
- Proceeding west across the junction from Egerton Road into Gill Avenue where the traffic is funnelled into a single lane simply does not work. I appreciate that this may well be a hospital road but the fact remains that a great number of businesses are in the Surrey Research Park and they require access. This would benefit from an
Through an additional lane and you should consult the hospital on the matter. It may also be a consideration to add access into the research park from the back of the hospital through from Park Barn.

- As a matter of etiquette, cars are not funnelling into the single lane at this point nicely and is a source of much road rage each day for many drivers. Perhaps a sign to remind people?
- Cars actively using the hospital entrance access road as a shortcut to circumnavigate the traffic on Gill Avenue and cut in further up. I'm sure you can appreciate how ridiculous and unnecessarily dangerous this is.
- For the underpass on Egerton Road, cars are accelerating down the outside lane going West to then cut up those queuing on the inside lane who are waiting to proceed across the grid locked roundabout. They do so in a very aggressive fashion and I'm surprised we've not seen a great deal more accidents.
- On the same underpass, people (possibly students) are walking underneath alongside the road using the narrow strips of pavement that are there. As a driver, this makes me nervous as I don't believe pedestrians should be in such close proximity to moving vehicles.

Whatever research you've done, it is flawed, and in no way considers the environmental impact or the sanity of those commuting in and around the area. The potential effect is that you risk businesses moving away from the area, probably into Hampshire, because the well being of their staff is also being affected.

Adding more commuters into the area without addressing the existing problems is unsafe and ludicrous. You will be affecting rush hour journey times, suffocating local businesses and their ability to function, as well as making it harder for emergency services to gain access to the hospital. As such, myself and many others would like to state the following:

We object to Guildford Borough Councils changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (policy A26 and para 4.1.9.), which:

- Directs more office space to an extended Business Park (Policy E4), which will increase peak-time congestion, particularly around the Hospital and A&E, and will also encourage rat-running through residential areas.
- Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review. (Para 4.3.8.).
- Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development. (2.14a).
- Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide (A26, Key considerations (7)).

Please address these concerns and drop your future development plans in their current form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/1301 | Respondent: | 17253473 / Ronald Large | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/4986</th>
<th>Respondent:</th>
<th>17253473 / Ronald Large</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area. Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

  "Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
a) The Street in Tongham  
b) A331/A323 intersection  
c) A31 /White Lane junction  

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"  

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:  
"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:

Comment ID: ps171/3217  Respondent: 17253473 / Ronald Large  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()  

Policy P3 - Countryside  
• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road  
• 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, a Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."  
• 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."  
• Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

Comment ID: pslp172/1304  Respondent: 17253569 / Nicholas James Wildman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1305  Respondent: 17253601 / Sonia Langridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1306  Respondent: 17253729 / Mr & Mrs Tasker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1307  Respondent: 17253825 / William Handley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1308  Respondent: 17253857 / Diana Hickox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1310  Respondent: 17253889 / Lynn Harmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1314  Respondent: 17253985 / Evenlyn Mary Simmons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1313  Respondent: 17254017 / K.B Rosam  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp172/1315  Respondent: 17254113 / Saraswathy Chandrasekaran  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp172/1348  Respondent: 17254113 / Saraswathy Chandrasekaran  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1316  Respondent:  17254145 / Simon Terry  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1324  Respondent:  17254241 / Jennie Weekos  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1326  Respondent: 17254273 / Tara Boxall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1332  Respondent: 17254337 / Heather Mary earl  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1333  Respondent:  17254369 / Patricia Elizabeth Burroughs  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp173/129  Respondent:  17254689 / Sue Martin  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to express my concerns over the revised plan. I was horrified to find that the land that had been given to the Raleigh School has been taken out of the local plan. There is urgent need for the school to be rebuilt as the quality of life for that pupils is suffering due to lack of up to date facilities and also space. The parking around the school has always been bad and with the increase numbers attending the school it will only get worse. There is no cost involved as the and has been given and moving the school would then in turn free up the site for low cost housing which is badly needed in the village. I feel it is very short sighted for the council to turn this opportunity down. Both my daughters attended the Raleigh many years ago and benefited greatly from excellent teaching and I would hate for the next generation of children not to have the same opportunities.

I hope that you will take my views concerning this matter into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1352  Respondent: 17254977 / Michael Dillon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1351  Respondent: 17255009 / Jacqueline Farley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1350  Respondent: 17255073 / Ann Purslow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1349  Respondent: 17255105 / Andrew Chalk  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/1347  **Respondent:** 17255137 / Bathya Chandrasekaran  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/1346  **Respondent:** 17255169 / Tomas Kollinsky  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1345  Respondent: 17255233 / Mary Tumber  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1343  Respondent: 17255265 / Rachel Dance  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1342  Respondent: 17255297 / Nigel Collinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1341  Respondent: 17255361 / Graham Sercombe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1355  Respondent: 17255489 / P Croxson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/916  Respondent: 17256513 / Guildford Environmental Forum (Adrian Thompson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:
In general, GEF believe that the 2017 Plan is a big improvement on earlier versions and that the reduced number of home planned (p21) and the reduction in planned increase in retail floorspace (p22) are welcomed as being improvements. However, in the detail, GEF have noted the following issues arising from changes to the Guildford Plan:

1. Clause 2.13 on page 13, accepts that “there is a fragmented and disjointed network of cycle routes, consisting of routes both on and adjacent to local roads, with the latter often comprising shared lanes for pedestrians and cyclists. Many cycle lanes and tracks are narrow and some are unattractive to the average cyclist.” Furthermore, clause 2.14b states that “A growth in cycling has occurred despite limited improvements to facilities for cyclists.” However, we have been unable to find proposals to improve this situation, which is unacceptable as this should be a very significant way to reduce transport emissions. Funding contributions are understood to be available from organisations like Sustrans.

2. On page 38, we welcome the changes to recognise the need for more family houses and accessible accommodation for older people. We believe that The Council could do more through the Council Tax system to encourage the use of empty houses and discourage the overinvestment in luxury houses.

3. GEF welcomes the additional clauing on page 61-63 to recognise the importance of Climate Change in planning policy. GEF would strongly recommend that:
   • Carbon emission targets should be set, as is the case in Woking, so as to set the framework for at least an 80% reduction in emissions by 2050. This requirement is set in law as a result of the Climate Change Act, 2008.
   • GEF believe that the performance against these emissions reduction targets should be monitored annually and action taken to ensure that the overall targets are achieved.

1. GEF welcomes the additional support on page 113-14 in respect of energy efficient CCHP systems.

Biodiversity. Clause 4.6.33 on page 134 of the Plan has been amended to state that:

“A positive approach to the provision and maintenance of Green Infrastructure is crucial to the maintenance, protection and enhancement of biodiversity and wildlife in the borough, not least through the provision creation of new habitats and by linking providing connections between existing habitats. It can further assist in adaptation to climate change by providing pathways for species dispersal and migration, climate change adaptation through providing the cooling effects of tree cover, and in the natural management managing of fluvial flooding, for example, through floodplain re-connection and restoration, provision, connectivity and which can also result in the creation of new wetland habitats.”

GEF agrees with these changes, but GEF would recommend that, additionally:

• The words “….without any one dominating over the others” should be added at the end of the new definition in clause 4.1.2a.
• In clause 4.5.20 the words “replace 110 litres/person/dayl” should be replaced by “less than 110 litres/person/day using fittings approval”. The evidence base for this alteration is the Gov.UK Approval Document G 2016 updates.
• In clause 4.6.28,
• At the end of clause 4.5.28a, we consider that the words “any CHP system should also help address power security system limitations in the town centre” should be added at the end of this new clause.
• After the word “restoration” in clause 4.6.33 that the words “and for retaining water for longer in upper catchment areas” should be added.
• In the next clause 4.6.34, the last sentence should be modified to “which is indicative of how much richer in wildlife the borough could become”. The evidence base for this is The State of Surrey’s Nature, published by the Surrey Nature Partnership 2017.
• We are pleased to note that GBC are “Planning a Green and Blue Infrastructure Planning Document
• The Council should immediately start developing a “Biodiversity and Green Infrastructure Strategy and Action Plan” for the period to 2034., which is much more specific in its aims than the draft Countryside Vision published in April 2017.
• The Council should appoint a Councillor with the title “Portfolio Holder for the Environment, Wildlife and Sustainability and Chair of the Council’s Climate Change Working Group”.

GEF believe that the recent publication of the Surrey State of Nature Report shows that Guildford should plan for a net gain in biodiversity and not accept the significant declines that were recorded in The Second State of Nature Report for the
UK which was published recently. This shows that over the past 50 years, 56% of our species have declined and that 15% of those assessed are at risk of national extinction. The UK has lost more nature than the global average: we are now one of the most nature-depleted countries in the world. As an affluent town, Guildford should be leading the way and thus ensuring that the Borough is a better place to live in 2034 than it is now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp17q/123  Respondent:  17256513 / Guildford Environmental Forum (Adrian Thompson)  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):  (Yes)

1. The Sustainability Appraisal (June 2017). This document seems to us to be adequate, up-to-date and relevant.
2. The Environmental Sustainability and Climate Change Study (updated 19.06.2017), although in many ways a very useful summary, it is somewhat out of date. We note that this Study contains very little new data since 2014 and that much of the evidence (see pages 43 to 46) dates back to 2007 to 2010. It refers on page 12 in clause 3.17 to new technical standards that will be introduced (ie in the future) in 2015. We do, however, agree with the substance of the Executive Summary of the report (even though based on evidence that may well be much more serious if it were based on more recent data):

   • Guildford Borough has higher carbon emissions than any other Surrey Borough (para 4.15 on p.18), mainly as a result of high road transport emissions.
   • Guildford Borough's carbon emissions in respect of household energy consumption exceed even those of Scotland, where the climate is much cooler (para 4.33) on p 22.
   • Small scale renewable energy production is lower in Guildford Borough than other parts of the UK (clause 4.42 on page 24).
   • Our water consumption is very high compared to England and Wales, while availability is low (clause 4.46 on page 25.
   • The potential for extreme climate change, and the possibility that change may come quickly, as the 2020s projections show, means Guildford will need to make plans for adaptation to begin in this plan period (Clause 5.13 on p. 29).

3. Surrey State of Nature Report. This valuable 32 page document has been produced by Surrey Wildlife Trust on behalf of the Surrey Nature Partnership in 2017. We have found no reference to it in the Local Plan 2017, but we believe that the update on biodiversity that it contains, should be taken account of in the 2017 Local Plan. In its conclusion it states that “We are entering a new phase and scale of development to deliver housing and related infrastructure across the county. Our resources will be stretched ever tighter to ensure these proceed as sustainably as possible, by incurring no further losses to Surrey’s biodiversity but instead offering opportunities that result in a genuine net gain”. GEF would recommend that pages 24 and 25 of this Report, which discuss the importance of “Natural Capital”, should be incorporated by GBC in the Guildford Local Plan. We note that the Surrey Nature Partnership plan to produce a “Natural Capital Investment Plan” in 2017 and would recommend that GBC consider this seriously in implementing the Guildford Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/1361  Respondent: 17256577 / Tina Makin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1360  Respondent: 17256577 / Tina Makin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1363  Respondent: 17256577 / Tina Makin  Agent:
I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

Attached documents:
The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. *The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”*
2. *The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”*

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1358 Respondent: 17256577 / Tina Makin Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become *even more* biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within *3 miles of Send Marsh*, most of them on Green Belt. This is *grossly unfair* on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1359 Respondent: 17256577 / Tina Makin Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan is self-inconsistent in respect of traveller sites. A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1362  Respondent: 17256577 / Tina Makin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/320  Respondent: 17256577 / Tina Makin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/319  Respondent: 17256577 / Tina Makin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or *payment in lieu* is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/321  Respondent: 17256577 / Tina Makin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: pslp171/322</th>
<th>Respondent: 17256577 / Tina Makin</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it's insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/327</th>
<th>Respondent: 17266785 / Ryan Brown</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Since Brexit, forecasts of increasing population numbers have been reduced. The ONS forecast is now only forecasting 10.4% for Guildford, which still intends to increase its housing stock by 22%. This doesn't seem to make sense?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/326</th>
<th>Respondent: 17266785 / Ryan Brown</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: pslp172/1379</td>
<td>Respondent: 17267265 / Patricia &amp; Normal Bloomfield</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-----------------------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

57% of new housing proposed is on land that is currently categorised as Greenbelt and this is, quite frankly, shameful as this land was supposed to be protected for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1380</th>
<th>Respondent: 17267265 / Patricia &amp; Normal Bloomfield</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Clockbarn Nursery, Tannery Lane, Policy A42
I object to the Policy A42 change at Clockbarn in Tannery Lane because:
• The increase to 60 homes in place of 45 homes is 33% more and is already too much
• It ignores all the thousands of previous objections made by local people that live in Send
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse
• It will impact open countryside views from the River Wey Navigation
• The local school and doctor’s surgery are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Clockbarn Nursery, Tannery Lane, Policy A42
I object to the Policy A42 change at Clockbarn in Tannery Lane because:
• The increase to 60 homes in place of 45 homes is 33% more and is already too much
• It ignores all the thousands of previous objections made by local people that live in Send
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse
• It will impact open countryside views from the River Wey Navigation
• The local school and doctor’s surgery are already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1381  Respondent: 17267265 / Patricia & Normal Bloomfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlick's Arch, Send Marsh, Policy A43.
I object to the Policy A43 change at Garlick's Arch because:
• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location and is not wanted
• It is beautiful permanent Green Belt and no "exceptional circumstances" exist
• It will cause over-development of our village and the number of homes is hugely excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads even more than already does of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1382  Respondent: 17267265 / Patricia & Normal Bloomfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Burnt Common, London Road, Policy A58.
I object to Policy A 58 at Burnt Common because:
• It was deleted from the 2014 draft because of all the objections made previously
• The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/334  Respondent:  17267265 / Patricia & Normal Bloomfield  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15
I object to the proposal to inset Send Business Park from the Green Belt because:
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/341  Respondent:  17267393 / Steve Knight  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I support the protection of agricultural land in rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/342  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am pleased to see that Jacobs Well has been added to the list of rural local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/336  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the amendments but feel that there should be a higher density of housing in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/337  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the removal of section 4.2.54 and its caveats regarding priority to be given to new homeowners/occupiers having local links to the relevant area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/344  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is vital that stringent measures are put in place to ensure that infrastructure improvements precede all new development. I feel that the GBC plans are still too weak. Infrastructure changes must be viewed borough wide and not in isolation. Our village of Jacobs Well already suffers from unacceptable traffic congestion (leading to delays), high air pollution levels, noise pollution and rat runs. The development of SARP, Wisley and Gosden Hill could place an unacceptable burden on the A320, Clay Lane, Jacobs Well Road and our village of Jacobs Well unless appropriate measures are taken. Flooding, both surface water and fluvial, is also an issue in our area which needs to be addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/346  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the additions that state that any new developments must take into account the impact on air quality, noise and the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/343  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although GBC have added some additional verbiage aimed at protecting villages re infilling, I do not feel this goes far enough. Development in the villages should be appropriate in scale and have no unacceptable effect on the occupants of existing buildings. This has not always been the case with previous infilling developments which have been accepted in Jacobs Well. I also feel that the data source, with regards monitoring, should also be planning applications, not just planning appeals

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/339  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although I welcome the fact that flow routes will be considered as part of any Flood Risk Assessment, I am still totally opposed and object to any development on flood plains. Jacobs Well suffers from flooding, being close to the zone 3b floodplain near Burpham Court Farm where a major road development, The Clay Lane Link Road, is still under consideration. With town centre and SARP development going ahead (and related flood risk mitigation), plus climate change (and the increased potential for flash storms), to ensure risk to properties is only once per 100 years, the Burpham Court Farm zone 3b flood plain is therefore even more important in reducing the risk of flooding in Jacobs Well and must be preserved as is and not developed upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/335  Respondent: 17267393 / Steve Knight  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed new homes figure of 654 per annum. Although reduced from 693 the JWRA feel that such a high level of housing cannot be justified, particularly in the light of the new economic situation. I also feel that the figures are based upon erroneous assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/355  Respondent: 17267745 / Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the protection of agricultural land in rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/357  Respondent: 17267745 / Maureen Knight  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am pleased to see that Jacobs Well has been added to the list of rural local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the amendments but feel that there should be a higher density of housing in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/351  Respondent: 17267745 / Maureen Knight  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the removal of section 4.2.54 and its caveats regarding priority to be given to new homeowners/occupiers having local links to the relevant area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/359  Respondent: 17267745 / Maureen Knight  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is vital that stringent measures are put in place to ensure that infrastructure improvements precede all new development. I feel that the GBC plans are still too weak. Infrastructure changes must be viewed borough wide and not in isolation. Our village of Jacobs Well already suffers from unacceptable traffic congestion (leading to delays), high air pollution levels, noise pollution and rat runs. The development of SARP, Wisley and Gosden Hill could place an unacceptable burden on the A320, Clay Lane, Jacobs Well Road and our village of Jacobs Well unless appropriate measures are taken. Flooding, both surface water and fluvial, is also an issue in our area which needs to be addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I support the additions that state that any new developments must take into account the impact on air quality, noise and the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Although GBC have added some additional verbiage aimed at protecting villages re infilling, I do not feel this goes far enough. Development in the villages should be appropriate in scale and have no unacceptable effect on the occupants of existing buildings. This has not always been the case with previous infilling developments which have been accepted in Jacobs Well. I also feel that the data source, with regards monitoring, should also be planning applications, not just planning appeals

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Comment ID: pslp171/349</th>
<th>Respondent: 17267745 / Maureen Knight</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although I welcome the fact that flow routes will be considered as part of any Flood Risk Assessment, I am still totally opposed and object to any development on flood plains. Jacobs Well suffers from flooding, being close to the zone 3b floodplain near Burpham Court Farm where a major road development, The Clay Lane Link Road, is still under consideration. With town centre and SARP development going ahead (and related flood risk mitigation), plus climate change (and the increased potential for flash storms), to ensure risk to properties is only once per 100 years, the Burpham Court Farm zone 3b flood plain is therefore even more important in reducing the risk of flooding in Jacobs Well and must be preserved as is and not developed upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1400  Respondent: 17268385 / Kirsten Mellow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new homes figure of 654 per annum. Although reduced from 693 the JWRA feel that such a high level of housing cannot be justified, particularly in the light of the new economic situation. I also feel that the figures are based upon erroneous growth assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy A42 change as the increased number of homes proposed for the Clockbarn nursery site fails to account for the previous objections to the original 45 houses proposed for this site. I am concerned that it will have a significant negative impact upon traffic along tannery lane and, in particular, the junction between tannery lane and the A247. I am also concerned that this development is will negatively impact upon the Wey Navigation, as it will impede what are currently open countryside views protected by the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1401</th>
<th>Respondent:</th>
<th>17268385 / Kirsten Mellow</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the proposed changes to policy A43 as it takes no account of the many objections to this development made in the response to the 2016 draft Local Plan. I have seen no evidence of demand for plots for travelling showpeople at this site and I also do not see that there are any ‘exceptional circumstances’ that would justify development on the Green Belt at this location. The total number of homes proposed is very high considering the overall size of Send village without any planned increase in infrastructure necessary for such a development. It also seems likely to join Send and Ripley, thereby directly going against one of the key purposes of the Green Belt. I am also concerned about the impact of this number of homes upon the local traffic system.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1403</th>
<th>Respondent:</th>
<th>17268385 / Kirsten Mellow</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Policy A58 as this policy was deleted from the previous draft plan of 2014 due to the number of objections received and its inclusion now seems like a cynical attempt to ignore past concerns with the plans. I especially object to the change from ‘maximum’ in the 2016 Local Plan to ‘minimum’ as this will lead to the development of far more industrial capacity than is supported by the 2017 Land Need Assessment survey that indicated that the whole Borough needs under 4 hectares of industrial land and this proposal is for at least 10 hectares of development at Send, when there is also underutilised industrial units in Slyfield and Guildford that should be the primary site for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1418</th>
<th>Respondent:</th>
<th>17268833 / Philippa Wright</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1419</th>
<th>Respondent:</th>
<th>17268865 / Gaye Henderson Elvidge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1429  
Respondent: 17269537 / Barry & Sonia Talman  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is my understanding that this proposal is a major shift, that disregards The expert Landscape Study – The change along with umpteen other proposed changes have been high lighted and are well documented. If these objections to change are in themselves not enough then for once take notice of local opinion an the subject.

These changes are objected to. Please don’t go down that route

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1461  
Respondent: 17269537 / Barry & Sonia Talman  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1430  Respondent: 17269569 / Margaret Patricia Swain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1432  Respondent: 17269601 / Margaret Ann Rogers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1433  Respondent: 17269633 / Dennis Patrick  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1434  Respondent: 17269665 / Eleonore Kouyoumijan  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1435  Respondent:  17269697 / Arthur Horner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/1604  Respondent:  17269697 / Arthur Horner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31 /White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:
Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1438  Respondent: 17269761 / S A Well  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1439  Respondent: 17269793 / Sarah Coutts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1440  Respondent: 17269825 / Joanna Radomska-Lane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1441  Respondent: 17269889 / Barry John Milette  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1444  Respondent: 17269921 / John Frankish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1442  Respondent: 17269953 / Susan Hills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1445  Respondent: 17269985 / G.P Ayres  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
- it agriculture land (moderate/good) within the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1446  Respondent: 17270017 / John Mansfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1540  Respondent: 17270017 / John Mansfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Policy P3 - Countryside

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
• 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, the Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
• 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”
• Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1448</th>
<th>Respondent:</th>
<th>17270049 / Frederick Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1454</th>
<th>Respondent:</th>
<th>17270081 / Mr &amp; Mrs Bond</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( ), is Sound?</td>
<td>( ), is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1455  Respondent: 17270113 / E.R. Willmott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1457  Respondent: 17270145 / Anne Quarrier  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1464  Respondent: 17270337 / John William Stolons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1466  Respondent: 17270401 / Christina Rule  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3511</th>
<th>Respondent: 17271201 / Karen Deane</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because of the following reasons...

- There were thousands of previous objections made by local people, which are being totally ignored
- It will bring about over development of my village, and join up Send and Ripley thereby defeating the main purpose of the Green Belt
- It is ancient woodland which is subject to frequent flooding. Living as I do, only a couple of hundred metres from the site, and having already suffered major flooding in 2000 requiring me to move out of my property for 6 months, I am vehemently against any development within the immediate area which would potentially upset the fragile status quo.

I would like to state that I am not against all new build policies – I have children in their twenties who need homes and recognise the need to increase the housing stock. However, this development needs to be within current village boundaries, and in areas where School and Medical provision is adequate. Wisley Aerodrome is a site which makes total sense to me, due to the location near the A3/M25 and the fact that it is already mostly covered in concrete.

Please take the views of those who live locally into serious consideration!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1486</th>
<th>Respondent: 17271233 / Roger Tarring</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID: pslp173/141</th>
<th>Respondent: 17275713 / Mandy Blackmore</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am writing to support the removal of A46 and A47 from the local plan, because having lived in Normandy for 12+ years, I don't believe that the roads, sewage and power could deal with 1150 more houses. In the past few years, we have seen an increase in traffic and road problems, we have power cuts sometimes for days at a time and the area suffers flooding.

We moved here so that we could experience a slightly less hectic life with green fields and village atmosphere, but slowly bit by bit that is being lost with the closing of 2 village pubs and the threat of our green belt being bulldozed over. Stupidly we had assumed that being in green belt would offer us a level of protection from future developments......

Whilst writing I would also like to say how bewildering it is to find random patches of land taken over by the travelling community without any recrimination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID: pslp173/143</th>
<th>Respondent: 17275745 / Islam Kovaci</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</th>
</tr>
</thead>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I oppose object building homes on Guildford road. Northern end of Glaziers lane. Flexford. Walden cottages and palm house nurseries traveller site.

I also want to see the removal of site A46 - 1100 homes and school.

Removal of site A47 - 50 homes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1539  Respondent: 17275809 / J. Mansfield  Agent:

<table>
<thead>
<tr>
<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</th>
</tr>
</thead>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain the sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”
Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31 /White Lane junction

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:
"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:

Comment ID: pslp171/379  Respondent: 17275809 / J. Mansfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, a Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

Page 2204 of 2988
• 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

• Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

---

Comment ID: pslp17q/47  Respondent: 17276289 / Tom Newton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

1. I am concerned that despite an increase in traffic on the A3100 Burpham slip road of 15% since 2013 (per DoT Traffic count information) no consideration has been made of identifying a baseline air quality in the corner of land bounded by the A3 and the A3100 slip road. There is one primary school in this area and intensive residential housing in the area but no evidence that any air monitoring, or detailed modelling has or will been done there. There are currently stationary traffic jams every week day morning and afternoon and now at the weekends, particularly when Aldi is busy, yet your own Air quality assessment states that there are no sensitive receptors along the London road which is used to justify that ‘- Section 5.2.1 of the report:

"On London Road, where the largest changes in flows are anticipated, there are no air quality sensitive receptors located along the road, therefore significant adverse effects on air quality are not anticipated."

How can there be no sensitive receptors along the A3100 coming away into Guildford form the A3 - there are homes next to the road?

In terms of evidence this is significant flaw in accuracy and therefore conclusions with regard to air quality impacts in this area.

2. Further to this the in the Strategic Highway Assessment Report paras 4.7.7, 4.7.8 and 4.11.4 the traffic impact assessment of differing scenarios - Do nothing through to Scenario 5 show that there will be significant problems at the
A3100/B2234 roundabout under all scenarios which is then not addressed anywhere - implies the main route for new residents at the Gosden Hill strategic site travelling into Guildford, existing residents, anyone coming onto Guildford southbound along the A3 and those coming into Burpham to use the proposed new southbound A3 on-slip will be stuck at that roundabout, exacerbating existing issues already prevalent there on a daily basis.

So evidence is available to show that problems with traffic will occur in the Burpham area but there is no attempt to mitigate this and no discussion of potential air quality impacts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/48  Respondent: 17276289 / Tom Newton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Given:

1. rapidly increasing traffic flows (15% increase since 2013 per DoT Traffic count data) on the A3100/A3 southbound off slip and
2. increasing congestion now prevalent causing regular traffic jams in the area and
3. lack of clarity that the combined impact of the Jacobs Well link road and the local plan together are being considered and
4. no current air quality monitoring in the area and
5. no intention to perform any modelling of air quality around the A3/A3100, an area including a Primary school and intensive housing now and
6. no plan for detailed air quality modelling of the impact of yet more traffic in the area, as identified in the Strategic Highway Assessment report, as the Local plan developments are delivered

the Council will not be able to demonstrate it has met its duty to adequately assess Air quality impacts of the Plan in this area. As such I believe the Plan will be subject to legal challenge incurring extended time delays and cost in its delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/49  Respondent: 17276289 / Tom Newton  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not believe that the plan is sound specifically because

1. whilst evidence identifies significantly increased traffic levels in the Burpham area nothing has been shown to mitigate this

2. with minimal on non-existent current air quality monitoring, air quality impacts are not adequately assessed in the Plan. It cannot be determined what current pollution levels there are now and what the impact of the plan will be in the future, particularly with regard to the Burpham area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/400  Respondent: 17276641 / David Raison  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

There is evidence Guildford’s population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period.

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1584</th>
<th>Respondent: 17277409 / Voytek Sarama</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1586</th>
<th>Respondent: 17277441 / Kay Wheller</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/1598  **Respondent:** 17278753 / Laura Farrell  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/1599  **Respondent:** 17278817 / Janette Costello  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1601  Respondent: 17278849 / Calogera Sanfilippo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1616  Respondent: 17279105 / Claire Bryant  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1614  Respondent: 17279137 / Alison Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1609  Respondent: 17279297 / Edward Mallory  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/1618  **Respondent:** 17279329 / Pamela Horner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Correct title of Policy A28 to say Ash Green, and not Ash.

- Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Correct title of Policy A28 to say Ash Green, and not Ash.

Opportunities (1) Should read: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

**Attached documents:**

---

**Comment ID:** pslp172/1605  **Respondent:** 17279329 / Pamela Horner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

---
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31 /White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:
"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/419</th>
<th>Respondent: 17279329 / Pamela Horner</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, the Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1607</th>
<th>Respondent: 17279361 / Dawn Cridland</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Page 2215 of 2988
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1621  Respondent: 17279617 / Virginia Angus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

I am writing to object to the proposed development of 1,800 homes at Blackwell Farm site (at the foot of the North side of the Hog's Back).

I live in the beautiful village of Compton and I feel very privileged to live here, after having moved from London. Sadly the traffic through Compton, both day and night is horrendous. It is continuous and it has been reported that the levels of Nitrogen Dioxide are consistently above the EU legal limit so any increase in traffic levels through Compton, such as the proposed access road to Blackwell Farm, will make this situation worse. Also, as you know, the site is dependent on a new access road from the A31 Hog's Back to the hospital roundabout at Everton Road, with a new signalised junction on the A31 at the entrance of Down Place, at the top of Down Lane. Compton cannot cope with the traffic as it is. Everyone avoids walking down The Street (the main road through the village) as cars and heavy articulated lorries are too close for comfort.

Also, the Surrey Hills is an Area of Outstanding Natural Beauty. I feel it is my moral duty to protect this beautiful ancient woodland and the wildlife that is dependant on it for our's and for future generations. We are privileged to have such amazing wildlife and beautiful green land, why would you want to destroy this? Something that once done is irreversible. I do not believe that you have considered the long term consequences of your decision. Great, have lots of houses, but what of people's mental health and wellbeing?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
• I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. The Greyhound Pub roundabout
3. A331/A323 intersection
4. A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the
historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond.

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

---

Comment ID: pslp171/424  Respondent: 17279649 / Fiona Samuel-Holmes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- **4.3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
- **4.3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”
- **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:
Comment ID: pslp172/1622  Respondent: 17279681 / J Burningham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/426  Respondent: 17279713 / Dawn Catchpole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.13/2.14b Cycle lanes need to be included on footpaths/pavements to avoid the intimidation of car users driving dangerously.

2.15 The poor condition of the roads, ironwork below road level and potholes mean cyclists need to avoid riding close to the kerb. Our son has had to buy new tyres due to frequent punctures and also a complete new wheel again due to potholes. It becomes very expensive to cycle to and from work. In the winter months there is no street lighting once passed The Pines business park until you get passed the Infant School. Cycle lights do not show up all the potholes nor where there is debris on the road, our son ran over a piece of metal one evening in the dark which ripped his tyre to shreds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/423  Respondent: 17279713 / Dawn Catchpole  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
4.2.10 It is essential to have more accessible accommodation for wheelchair users and to also bear in mind that not all users are elderly. There are users across the ages and younger people, i.e. 20s would not want to be in an area of people in their 70s. I am 58 and would not want to be in an area of all elderly people or young people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp17q/50  **Respondent:** 17281601 / Pirooz Karbasian  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We object your plan for the following reasons:

- In view of flawed new evidence, Guildford's proposal for more than 12426 homes (plus a buffer of 1155 homes) is excessive and will result in needless loss of green belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.
- There is evidence Guildford's population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.
- Allocating more land for development in 2017 plan will also result in Guildford being required to provide homes for Woking on our green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp173/168  **Respondent:** 17283297 / John Ball  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Policies A37, 38, 40, 42, 44 & 45 – My Objections**

10) Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/1651  **Respondent:** 17283297 / John Ball  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

---
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

2) South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

3) A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

4) When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1659  Respondent: 17283297 / John Ball  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of
development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are
already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

27. Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1660  Respondent: 17283297 / John Ball  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (APP. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:

- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/441  Respondent: 17283297 / John Ball  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/56  Respondent: 17283297 / John Ball  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Non-plan Items– My Objections

12) Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

13) Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016
draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

**Duty to Cooperate – My Objections**

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/1646  **Respondent:** 17283457 / Trudy Hills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to policy A42 change at Cockbarn in tannery lane because:

- I believe it should not take place in the first place, however a further increase in the number of homes is proposed which make the situation even worse
- The traffic in this area is getting worse and especially at the A247 junction
- Green belt land is protected in law and I see no reason that it should be built on.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/1647  **Respondent:** 17283457 / Trudy Hills  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to policy A43 change at Garlicks Arch because:

- I do not see any exceptional circumstances that should force the erosion of green belt land
- It will remove the 'green belt' between Ripley and Send that is necessary for the survival of our native species such as Hedgehogs
- It will generate further traffic that will clog up the area to the detriment of all those currently living here
- A further 400 homes will put further pressure on local services, which are currently at breaking point; transportation, hospitals, education etc.
- There is no proven requirement for travelling show people plots
- It will spoil the current beauty and openness of the area, which is what attracted my family and I in the first place.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: pslp172/1648  Respondent: 17283457 / Trudy Hills  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to Policy A58 at Burnt common because:

- It was deleted from the 2014 draft because of all of the previous objections so I cannot understand why it has now been included again
- Industrial and warehousing could not be further from the idea of protected greenbelt land, Slyfield would be the obvious choice for such purposes as it already have the infrastructure and a grouping of similar businesses. This is not a good reason to irrevocably damage our Green Belt.
- I would like to leave my house in the future to my children and I want it to be surrounded by Green Belt land as it is now including all the nature that encompasses
- The word 'minimum' is a change from the previous 'maximum' in the 2016 plan and since that point there has been a decline in the demand for such industrial land
- The 2017 Employment land Need assessment shows a reduction in demand to 3.9 hectares, rather than the massively inflated 10 hectares in send on the green belt

---
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/443  Respondent: 17283457 / Trudy Hills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business park from the green belt because;
- It will generate further traffic that will clog up the area to the detriment of all those currently living here
- It is an areas of outstanding beauty and is quite rightly protected as green belt that would be completely destroyed by this change
- there is no exceptional circumstance why the current green belt allocation should be changed for this purpose

Please take every one of these objections into consideration for the local plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1670  Respondent: 17283905 / Julie Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the revised plan for the Borough and to make my concerns known, in writing. I understand the need for extra housing but the Site A43 Garlicks Arch is on Greenbelt Land. Greenbelt Land has been allocated for a purpose it is important not lose sight of the hugely positive impact having Greenbelt Areas provide to the local environment. The local roads are already hugely congested and run down and cannot cope with any major increases in traffic which will occur with such a large build plan in the local area.

I am also extremely concerned about the inclusion of 6 Traveller Showpeople plots in the area, the number of which is out of scale with the development according to the designated formula.
We need proper consultation on any plans for Waste Management Facilities and the increase in industrial floorspace. Many local people are hugely concerned about many aspects of this plan and the potentially negative impact it will have on our local RURAL environment and our quality of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1694  Respondent: 17284417 / Carol Davenport  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please be advised that I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceeds safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1697  Respondent: 17284449 / John Davenport  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Please be advised that I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceeds safe EU limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/1710  **Respondent:** 17285249 / Stephen Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically, I object to Policy A42 change at Clockbarn in Tannery Lane because:

- It will cause extreme congestion at the junction with the A247. Already, at certain times of the day during the working week the whole village is gridlocked. This proposal will only serve to exacerbate the problem
- It will remove greenbelt land which gives the village its ‘village feel’
- It will damage open countryside views from the River Wey Navigation and create an eye sore
- It will risk increasing the likelihood of surface water flooding

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/1711  **Respondent:** 17285249 / Stephen Green  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 change at Garlick’s Arch because:

- There is no proven demand for Travelling Showpeople plots in this location
- It will cause the village to be ‘over-developed’ with the consequent impact on local services such as schools and health services which are already stretched
- It will join up the villages of Ripley and Send into one ribbon development and so defeat the key purpose of having a Green Belt
- It is a flood zone 2 area
- It will cause excessive traffic which will increase air pollution and cause congestion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/1712  | Respondent: | 17285249 / Stephen Green | Agent: |
|-------------|---------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A58 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | |
| Answer (if comment is on questions 1-7 of the questionnaire): () | |

I object to Policy A58 at Burnt Common because:

- It seems unfair to resurrect this idea given all the previous objections resulting in it being deleted from the 2014 plan
- With the increased uncertainty caused by Brexit there is an anticipated decline in demand for industrial land in the South East
- The industrial estate in Slyfield and in other parts of the borough have spare sites and excess capacity
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not the proposed huge allocation of over 10 hectares at Send – and in the Green Belt
- Once again, the impact on congestion will be significant

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp171/474  | Respondent: | 17285249 / Stephen Green | Agent: |
|-------------|---------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) | |
| Answer (if comment is on questions 1-7 of the questionnaire): () | |
I object to the proposal to inset Send Business Park from the Green Belt (Policy 2 at paragraph 4.3.15) because:

- It is effectively an old non-conforming user in an area of outstanding natural beauty which will be lost forever with consequent impacts on the quality of life of future generations
- There is highly restricted vehicular access along Tannery lane – in both directions
- Once again, it eliminates the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/179  Respondent: 17285377 / Claire Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the limited changes and raise our continuing concerns regarding your weakly amended 2017 plan for the Horsleys. It appears that GBC are continuing to fail to listen to the voice of the local communities and their very valid concerns.

At this point these centre around, but are not limited to, the four housing development sites which remain in your plan.

We have viewed the plans and would like you to recognise that the 30,000 objections to your 2016 plan appear not to have been listened to, as there is little evidence that the current plan reflects local community views.

I look forward to hearing that GBC have finally listened to the objections lodged during the public consultation period which is indeed why we assume the process exists.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/180  Respondent: 17285473 / Paul King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
With reference to the planned developments in and around Send Village.

1. I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.
2. I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.
3. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.
4. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brown field areas much closer to existing transport hubs.
5. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.
6. I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.
7. I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.
8. I object to the development at Garlic’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.
9. I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.
10. I object to the development at Garlic’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.
11. I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.
12. I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.
13. I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.
14. I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.
15. I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.
16. I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp172/1730</th>
<th>Respondent: 17285569 / Angela Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- It ignores the hundreds of previous objections made by local people
- It will cause terrible traffic problems along SINGLE TRACK Tannery Lane, and at the junction with Send Road (A247)
- It will further (and unnecessarily) erode the Green Belt
- It will make surface water flooding, which is already bad, even worse
- The increase to 60 homes from 45 homes is opportunistic.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1731</th>
<th>Respondent: 17285569 / Angela Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores the THOUSANDS of previous objections made by local people
- There is NO PROVEN DEMAND for Travelling Show-people plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our villages and the number of homes is excessive
- It is liable to frequent flooding and is currently a flood zone 2 allocation

- It is glorious ancient woodland that has existed from the time of Elizabeth 1. It is vandalism of the greatest order to demolish an area of such wonderful heritage.
- It will join up Ripley and Send and defeat the key purpose of Green Belt

**Attached documents:**
It is contaminated by lead shot accumulated over fifty years

It will cause massive traffic congestion that will block the local roads of Send and Ripley

It will ramp up (already unacceptably high levels of) air pollution

It does not address the problem of inadequate infrastructure – roads, schools, medical facilities – AS REQUIRED BY LAW

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1732  Respondent: 17285569 / Angela Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to Policy A 58 at Burnt Common because:

   It was deleted from the 2014 draft because of all the objections made previously

   The word “minimum” is a change from the previous “maximum” in the

2016 plan and since that time there has been a decline in demand for industrial land

   There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units

   The 2017 Employment Land Need Assessment shows a REDUCTION in demand to 3.9 hectares for industrial land for the WHOLE BOROUGH, not a huge over allocation of 10 hectares at Send in the Green Belt

   The impact on small surrounding roads will create traffic GRIDLOCK

   It will expose local residents to illegally high levels of air pollution

   It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/480  Respondent: 17285569 / Angela Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

There is highly restricted vehicular access along Tannery Lane in both directions - it is almost entirely single track

Further expansion or development at this location detracts from the openness of the Green Belt and is COMPLETELY inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/5408  Respondent: 17285857 / Network Rail (Daniel Chalk)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A10

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A10: Land for Sustainable Movement Corridor Town Centre Phase 2, off Walnut Tree Close, Guildford

Network Rail are currently working closely with Guildford Borough Council to specify and remit a study that will look at all railway land requirements around Guildford to ensure that sufficient land is available to provide the infrastructure to meet growth and demand on the railway (potentially in the form of additional platform capacity).

This study will help to ascertain the land available for development and is an important example of how Network Rail is working closely with our stakeholders to identify land that can be utilised to meet the needs of the railway and the wider community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1744  Respondent: 17285857 / Network Rail (Daniel Chalk)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Policy A26: Blackwell farm, Hogs Back, Guildford

Network Rail have worked closely with Guildford Borough Council and other interested parties on a potential station within this site allocation. A GRIP 2 study was commissioned by Guildford Borough Council that has looked at a location within this site and one within Policy A59 as potential new station locations.

We will therefore continue to work with the proposer of the new station as required and necessary to ensure that railway requirements are taken account of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Policy A3: land between Farnham Round and the Mount, Guildford

As stated in the requirements there is a signal box on the site so it is important that any aspirations to develop the site take account of the Wessex Route’s plan for re-controlling all signalling into the Basingstoke ROC.

Network Rail are currently working closely with Guildford Borough Council to specify and remit a study that will look at all railway land requirements around Guildford to ensure that sufficient land is available to provide the infrastructure to meet growth and demand on the railway (potentially in the form of additional platform capacity).

This study will help to ascertain the land available for development and is an important example of how Network Rail is working closely with our stakeholders to identify land that can be utilised to meet the needs of the railway and the wider community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A59: New Rail Station at Guildford West (Park Barn)

Network Rail have worked closely with Guildford Borough Council and other interested parties on a potential station within this site allocation. A GRIP 2 study was commissioned by Guildford Borough Council that has looked at a location within this site and one within Policy A26 as potential new station locations.

We will therefore continue to work with the proposer of the new station as required and necessary to ensure that railway requirements are taken account of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1736  Respondent: 17285857 / Network Rail (Daniel Chalk)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A7: Land and buildings at Guildford railway station, Guildford

This site has previously been included in the Solum property development scheme at Guildford and is currently on hold while the appeal process is carried out following planning permission being denied.

Any plans to develop the site should take account of railway requirements relating to the station building and the need for it to be able to accommodate future growth in passengers. In addition any proposals should also address the permeability of the site from east to west via the footbridge.

Network Rail are developing a scheme to provide a Platform 0 on the east side of the station so it is important that any proposed development does not prevent this scheme from progressing once funding is available.

Network Rail are currently working closely with Guildford Borough Council to specify and remit a study that will look at all railway land requirements around Guildford to ensure that sufficient land is available to provide the infrastructure to meet growth and demand on the railway (potentially in the form of additional platform capacity).

This study will help to ascertain the land available for development and is an important example of how Network Rail is working closely with our stakeholders to identify land that can be utilised to meet the needs of the railway and the wider community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A8: Land west of Guildford railway station, Guildford Park Road, Guildford

This site has strong links to Policy A7, particularly in respect to ensuring permeability across the station between east and west sides via the footbridge. As noted in the Local Plan this land has a number of operational uses that will need to be consider in any decision on allocating this site for development.

It should also be noted that the land included in this site could have potential future railway use for additional platform capacity to meet future demand and growth at the station.

Network Rail are currently working closely with Guildford Borough Council to specify and remit a study that will look at all railway land requirements around Guildford to ensure that sufficient land is available to provide the infrastructure to meet growth and demand on the railway (potentially in the form of additional platform capacity).

This study will help to ascertain the land available for development and is an important example of how Network Rail is working closely with our stakeholders to identify land that can be utilised to meet the needs of the railway and the wider community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Network Rail is the statutory undertaker responsible for maintaining and operating the country’s railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings, and viaducts.

Could you please ensure that the following comments are taken into account and included within the preparation of your forthcoming Local Plan:

Development proposals affecting the safety at level crossings are an extremely important consideration for Network Rail. As you will be aware the Local Planning Authority have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure Order 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume of a material change in the character of the traffic using a level crossing over a railway.

Included below are sections from the House of Commons - Transport Committee - Eleventh Report - Safety at level crossings printed on the 24th February 2014.

The House of Commons - Transport Committee - Eleventh Report - Safety at level crossings states:

“Level crossings are a significant source of risk on the UK’s transport networks. Although the number of accidental deaths at level crossings has decreased in recent years, nine people died in 2012-13. Every one of those deaths was a personal tragedy which could have been averted. We recommend that the Office of Rail Regulation (ORR), which is responsible for rail safety, adopt an explicit target of zero fatalities at level crossings from 2020.”

“7. Level crossings are places where footpaths, bridleways or roads cross railway lines at the same level. Network Rail manages approximately 6,500 level crossings on the commercial rail network, and there are a further 1,500 crossings on heritage, industrial and metro railways. There are two general types of crossing: active crossings, which provide warnings or protection when a train is approaching, and passive crossings, which do not. Active protection may be automatic, or may require a signaler, driver or crossing keeper to perform certain actions. Passive crossings rely entirely on the user for their safe operation.”

“12. There are significant safety risks associated with the different forms of level crossing. Of Network Rail’s 6,500 crossings, 76% are passive crossings, which do not offer any warning of an approaching train (see Table 1). The decision on whether it is safe to cross is left to the user.”

In the recent report ‘Level Crossing Safety’ issued by the Transport Select Committee (Para 1 Pg 35) the following was stated that may be of use:- “Analysis of Network Rail and Department for Transport data shows that if an average walking trip includes a level crossing, the fatality risk to a pedestrian is about double the risk of an average walking trip without a level crossing.”

In relation to co-operation between railway operators, highway authorities and planning authorities:

“31. Local authorities must work with Network Rail and other railway operators to help keep level crossings safe. For example, local authorities’ plans for promoting walking and cycling routes that traverse level crossings can have a direct effect on safety at those crossings. However, the Association of Directors of Environment, Economy, Planning and Transport told us that liaison between Network Rail and local authorities is variable…Network Rail has highlighted a number of examples where local authorities have imposed planning obligations on developers, to help fund Network Rail’s construction of footbridges… However, in some cases planning authorities have consented to large developments and changes in road layout without due attention to the increased risk at nearby level crossings… In its report into a fatal accident at the Kings Mill No. 1 crossing near Mansfield, the RAIB (Rail Accident Investigation Branch) criticised the local authority for establishing a walking and cycling trail without discussing the likely impact on the usage of a level crossing with Network Rail.”

“32. Railway operators are already statutory consultees where proposed development is likely to result in a material increase in the volume or character of traffic using a level crossing…The Law Commission's proposal for broader statutory duty of co-operation on railway operators, traffic authorities and highway authorities in respect of level crossings is a sensible suggestion….However, in the case of footpaths, private crossings or unadopted roads (which are not maintained by
the highway authority), there is a case for adding planning authorities to that list….We welcome the duty of cooperation on railway operators, traffic authorities and highways authorities in respect of level crossings but recommend that it should also encompass planning authorities so that the impact of additional numbers of people using level crossings can be considered.”

We believe that proposals that impact upon level crossings should include S106 or CIL contributions to mitigate the impacts of those developments. Wherever possible Network Rail will seek closure of level crossings, and either replacement with a footbridge or inclusion of a diversionary route. We believe that S106 developer contributions should be used to fund footbridges and where this is not possible developer contributions should be used to fund any mitigation works at a level crossing as a result of increased type or volume of user. As Network Rail is funded by public remit we believe it is unreasonable to expect Network Rail to fund mitigation measures on railway infrastructure as a result of third party commercial development. We believe that the above comments should be integrated as policies within the Local Plan. Planning obligations for railway infrastructure should be included in the same manner as planning obligations for highways, local facilities etc. as developments can impact the railway and developer contributions should be levied to mitigate such impacts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1750  Respondent: 17286113 / Michael W F Brown  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1751  Respondent: 17286177 / Kate Riley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1752</th>
<th>Respondent:</th>
<th>17286241 / Robin Burns</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1753</th>
<th>Respondent:</th>
<th>17286273 / Clive Gay</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1761  Respondent: 17286561 / Pirjo Konto-Blunt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1764  Respondent: 17286593 / Peter Trevena  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/1766  **Respondent:** 17286657 / Kristine Good  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

*Now 60 homes in place of 45 homes previously*

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the **hundreds of previous objections** made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Land at Garlick's Arch, Send Marsh, Policy A43.

*Now 400 homes and 6 Travelling Showpeople plots*

I object to the Policy A43 change at Garlick's Arch because:

- It ignores all the *thousands of previous objections* made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth 1
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Land at Burnt Common, London Road, Policy A58.

*Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing*

I object to Policy A 58 at Burnt Common because:

- **It was deleted from the 2014 draft** because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development **in the middle of the Green Belt** when Slyfield and Guildford still have **empty** sites and industrial units
- The 2017 Employment Land Need Assessment shows a **reduction** in demand to 3.9 hectares for industrial land for the whole borough not a **huge over allocation of 10 hectares at Send in the Green Belt**
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/508  Respondent: 17286657 / Kristine Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

● It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
● There is highly restricted vehicular access along Tannery Lane in both directions
● Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1767  Respondent: 17286689 / Howard Hancock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1771</th>
<th>Respondent: 17286721 / Maureen Hancock</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1772</th>
<th>Respondent: 17286753 / James Harman</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/185  Respondent: 17286785 / David Guyer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ) , is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

I am writing to object to the proposals to move this part of Ash Green into the Tongham ATUA. I believe like many others that the location around Ash Manor, including its fields and historic buildings are part of the character of Ash Green. This will be lost if the area boundary is moved to include us in the tongham ATUA with its plans for 17

I fully agree with the the amendment which states that thought instead should be given to protecting the intrinsic character of Ash Green, preserving the role it plays in maintaining the separate identity of Ash, Ash Green, and Tongham. In particular I feel that the provision of a green buffer separating the new development and the properties fronting onto Ash Green rd, Foreman rd, and White Lane will do much to preserve the rural character of Ash Green.

There is concern also that not enough thought has been given to the protection of the Ash Manor site itself which is of considerable heritage importance. In particular views of it from the approaches from White Lane must be preserved.

Further concerns over how the transport infrastructure needed for these new developments is to be implemented should be addressed, namely The Street in Tongham, and the A331/A323 intersection, and also the A31/White lane junction. Until these are resolved there should be no development on A29 permitted.

My view then in regard to these concerns is that Ash Green must not be included in the Ash & Tongham Urban Area, and therefore that the ATAU boundary must not extend south of Ash Green road and Foreman road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2099  Respondent: 17286785 / David Guyer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1796  Respondent: 17288033 / Nicholas Gooding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1799  Respondent: 17288065 / John and Patricia Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1800</th>
<th>Respondent:</th>
<th>17288097 / Philip and Sylvia Wilds</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1801</th>
<th>Respondent:</th>
<th>17288129 / Paula and Lloyd Cliff</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The fundamental traffic problems around the Surrey Hospital, Research Park and through into Guildford town centre are essentially choking business in the area and driving people out … we are one such company happy to be leaving! This “proposal” to develop the area further, will only serve to exacerbate an already poor situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to Policy A42 change at Clockbarn in Tannery Lane for the following reasons:

The increase to 60 homes is excessive especially as I consider 45 is too many!!

It ignores all the many previous objections raised by the local people

It will serious worsen access and already unacceptable traffic problems in Tannery Lane and at the A247 junction

It will make erosion of the Green Belt in Send village worse

It will make surface water flooding a more serious threat than it is at present

It will impact countryside views from the River Way Navigation and will greatly affect the treasured wildlife

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A43 change at Garlicks Arch because:
It ignores all the thousands of previous objections made by local people
There is no proven demand for Travelling Showpeople in this location which would seriously adversely affect the value of nearby properties
It is beautiful permanent Green Belt and no exceptional circumstances exist
It will cause serious implications to the village and the number of proposed homes is excessive as our schools are already stretched to their capacity
It is exquisite ancient woodland and should always be preserved
It will join up Ripley and Send and defeat the key purpose of Green Belt
It is already subject to frequent flooding and is currently a flood zone 2 allocation
It is contaminated by lead shot accumulated over more than 50 years
It will generate excessive traffic that will block up the local roads of Send and Ripley which are already at an unacceptable level

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1811  Respondent: 17288289 / Ken Grainger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

I object to Policy A58 at Burnt Common because:
It was deleted from the 2014 draft because of all the previous objections
The word "minimum" is a change from the previous "maximum" in the 2016 plan and since then there has been a decline in demand for industrial land
There is definitely no need to build industrial or warehouse development in the middle of the Green Belt when both Slyfield and Guildford still have empty sites and industrial units
The 2017 Employment Land Need Assessment clearly shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt

The impact on small surrounding roads will create a more serious and unacceptable traffic gridlock

It will join up existing villages and defeat the purpose of Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/529  Respondent: 17288289 / Ken Grainger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation

There is highly restricted vehicular access along Tannery Lane in both directions

Further expansion or development at this location detracts from the openness of the Green Belt which both inappropriate and unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/193  Respondent: 17288385 / Ben Bramley Brett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Namely that it is unacceptable that the Local Plan is still proposing to “inset” East Horsley from the Green Belt. Plus changes in settlement boundaries mean the East Horsley settlement area will increase by 37% and include most roads south of the A246. This will cause huge congestion, pollution, danger, increased crime etc that will irreparably destroy what is a very pleasant part of the world for young families, older generations and young people to live.

Development of 100 homes is still proposed near Horsley Station - the trains are already overcrowded, this area is already very heavily populated, and poorly maintained, this will only serve to extend 'suburbia' into Horsley and increase danger to current locals.

This part of Surrey is reaching overcrowding levels with people being granted permission to build multiple properties on what were standard sized gardens without a new village being placed in the area. And then move on tax free. As you know around 57% of all new housing in the Local Plan is on land presently Green Belt, his has to be unsustainable and driven only by unnecessary greed, there must be other areas of Surrey and the UK where this is more appropriate. While the ONS forecasts population growth for Guildford at 10.4% over the Local Plan period, GBC proposes to increase its housing stock by 22% - why is this necessary?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1814  Respondent: 17288385 / Ben Bramley Brett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development of 2,000+ homes is still proposed at the former Wisley airfield site. I can appreciate that this area, not in green but brown belt, would appear ripe for development. And yet these plans will lead to big environmental impacts on traffic, wildlife, local infrastructure and quality of life for current residents. Consider the state of the roads now without increased traffic volumes, lorries etc.. All profits will go offshore, tax free there will be no local benefit financially other than increased council tax payments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1815  Respondent: 17288417 / Ian Dwyer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Please note that I strongly support the removal of these sites owing to the inability to support the infrastructure. I further object to homes being placed outside the Green belt. It is there to protect our countryside and I object to further travellers being permitted to reside in the area.

Lastly, please ensure the cars for sale at the end of Cobbett Hill on the grass verge facing Henley Park need to be removed. It is not a car showroom.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1816  Respondent: 17288417 / Ian Dwyer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please note that I strongly support the removal of these sites owing to the inability to support the infrastructure. I further object to homes being placed outside the Green belt. It is there to protect our countryside and I object to further travellers being permitted to reside in the area.

Lastly, please ensure the cars for sale at the end of Cobbett Hill on the grass verge facing Henley Park need to be removed. It is not a car showroom.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1828  Respondent: 17288513 / Andrew Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It ignores all the thousands of previous objections made by local people
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will increase surface water flooding, which is already a problem and is increasing with further development
• It will impact on the open countryside views from the River Wey Navigation
• It will cause erosion of the Green Belt in our village

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1829  Respondent: 17288513 / Andrew Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Garlik’s Arch, Send Marsh, Policy A43

I object to the Policy A43 change at Garlick’s Arch because:

• It ignores all the thousands of previous objections made by local people
• The is no proven demand for Travelling Showpeople plots in this location
• It will cause overdevelopment of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth I
• It will join p Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over 50 years
• It will generate excessive traffic that will block up the local roads of Send and Ripley It is beautiful permanent Green Belt and no ‘exception circumstances’ exist

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1830  Respondent: 17288513 / Andrew Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land at Burn Common, London Road, Policy A58

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/540  Respondent: 17288513 / Andrew Bedworth  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1837  Respondent: 17288705 / Lesley Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
SITE A35, FORMER WISLEY AIRFIELD

A new size of 95.9 hectares has been proposed without any consideration for local transport and will cause a huge increase in the local traffic which is already too high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1838  Respondent: 17288705 / Lesley Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITE A42, TANNERY LANE

An increase in size from 45 to 60 homes is proposed. Again, the traffic impact is significant on an already busy road in peak times and the knock on effect on Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1835  Respondent: 17288705 / Lesley Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITE A43, GARLICKS ARCH

The original proposal has been changed to now include a minimum of 400 houses, meaning that up to 650 houses will be built on this site. In addition this allows for 6 travellers sites with associated mixed use yards and storage. This is greenbelt land and the increase in houses and buildings are harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon. The inclusion of the travellers sites is inappropriate in a rural environment within the greenbelt and there is no identified need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp172/1836  
**Respondent:** 17288705 / Lesley Davies  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**SITE A58, BURNT COMMON**

Local residents have not had any consultation on this. To substantially increase the industrial space from 7000 sq ft to an unspecified amount gives residents little or no information and clarity. Also, the proposal for a waste management facility needs proper consultation with local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/543  
**Respondent:** 17288801 / Liz Kirk  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I believe the addition of at least 12 thousand new homes proposed for the green belt local to Guildford is excessive and unworkable for the environment, community and infrastructure of Guildford. Already the town of Guildford struggles hugely to cope with the number of people driving through its roads. The rush hour currently is horrendous and the whole place frequently descends into chaos if there is bad weather and or an accident. What will life be like with 1000s of more people and their cars!

The roads are congested now, there is not enough parking and Park and Ride is a ridiculous idea as no-one wants to go back and forth on a bus to their car with children and or shopping. After and before work these facilities operate strict opening hours that are unworkable for many.

I appreciate we have to have new homes for people to live in, but building on green belt is not the solution. The local economy will suffer as the congestion will prevent real growth. Our schools and hospitals need expanding more than what is proposed.

[Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have lived on Send Road for the last 20 years and I have very serious concerns about the changes to the local plan that will significantly impact Send and the surrounding villages.

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people including myself.
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction - there is simply no way this junction can take additional traffic.
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley - this is of significant concern to me as I live on Send Road, the traffic is already heavy and can also be very fast.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy A 58 at Burnt Common because:

- **It was deleted from the 2014** draft because of all the objections made previously
- The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions - this road is already quite dangerous as it is single track in a number of places
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | pslp171/554 | Respondent:  | 17288929 / Susan Hughes | Agent: |
|--------------|-------------|--------------|-------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The scale of housing development at the four housing development sites remaining in this Local Plan will put too great a strain on local infrastructure. The approximately 2000 proposed homes at Wisley Airfield will put too great a strain on the local infrastructure. It is not sustainable to build dormitory towns and simply call them sustainable. Shifting to cycling and walking discriminates against vulnerable members of the community - the disabled, those with small children, the very old, or the infirm, or those who are ill. Alternatives impact on already congested roads or over-subscribed peak hour rail services.

Building in and around East Horsley will destroy the culture and fabric of the village. The roads in the village are already congested without the additional new homes and subsequent increased usage. They are generally narrow, with potholes, cracks and other signs of wear. During heavy rains, the drains block and flooding results. The pavements do not run along every road through the village, and where they do, they are narrow and often cracked and uneven. It is a village; it was never designed to support a town.

The local primary school (the Raleigh) is already at capacity, resulting in local children being sent miles from their homes for schooling. In addition, Horsley Medical Centre is at capacity.

The proposals are unsustainable because they do not meet the objective of providing infrastructure to support the new homes. Nor do the proposals take any account of the strongly-held view (30,000 objections) that the Green Belt should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | pslp172/1842 | Respondent:  | 17288961 / Anthony & Ingrid Hobson | Agent: |
|--------------|-------------|--------------|-----------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2017 / Policy A35 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We strongly oppose the proposed development of the former Wisley Airfield. There are so many problems with this proposal that it is difficult to provide a comprehensive letter of objection.

In summary this is a proposal that, if approved, would place an unacceptable strain on an already overburdened infrastructure, whether schooling, medical facilities, roads, railways, parking and water supplies.

We are in the middle of another drought and the pressure on the water supply infrastructure is intense. The development is also unacceptably close to a prized national asset, the RHS Garden at Wisley. The M25 and A3 are already close to gridlock, as shown by the standstill on both 13 and 14 July.

The ameliorating proposals put forward by the developer in an adjacent planning application are ludicrously inadequate.

Please remove this proposal from the 4th document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We further object to Policy A58 at Burnt Common and is was deleted from the 2014 draft because of the previous objections. The word minimum is a change from the previous maximum in the 2016 plan and since that time there has been a decline in demand for the industrial land. There is little need to build more industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units. The 2017 Employment Land Need Assessment shows a reduction in demand for the whole borough, with no need for a huge allocation of 10 hectares at Send in the Green Belt. The surrounding roads will be gridlocked and will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/567  Respondent: 17289377 / Kathleen & Christopher Vernum  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Green Belt Policy 2 at paragraph 4.3.15, to inset Send Business Park as it is effectively an old non-conforming user in an area of outstanding countryside adjacent to the Way Naviation which is so popular with locals and tourists alike. There is highly restricted vehicular access along Tannery Lane in both directions and further expansion or development at this location is inappropriate.

We would like to keep Send as a village where people can thrive and live together without a large influx of further residents and businesses, which is the only reason we moved away from our previous home near Heathrow Airport. We are situated on Send Barns Lane and there is already a high volume of traffic passing our door which we had not anticipated, and we do not want further traffic re-directed along this route either as a short cut from the A3 or to be carrying more heavy lorries and trucks to access and serve businesses in this very small village.

Please do not allow these Local Plans to go through.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/568  Respondent: 17289473 / Mary Warren  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Policy 2, Paragraph 4.3.15  Removal of Send Business Park from the Green Belt. As already stated in the above objection, Tannery Lane is a narrow winding road completely unsuited to large HGVs. Already they cause considerable traffic problems and any increase in their number along this road will bring traffic to a standstill both in Tannery Lane and at its junction with the A247. The other exit from Tannery Lane is equally difficult and again unsuited to heavy traffic.

In conclusion, Send residents objected strongly to the previous version of the local plan. Despite this, the load on Send has increased. One has to wonder why Guildford Borough Council should single Send out for such over development when there are vacant brown field sites in Guildford and at Slyfield. No changes are proposed to the roads, schools, medical facilities or other essential infrastructure and the result will mean that Send becomes an overdeveloped suburb of Guildford with congested roads and traffic at a standstill pumping fumes into the air and damaging children's lungs. Is this really what they want?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp173/197  **Respondent:** 17289697 / Carolyn Sanson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The removal of Send Business park from the Greenbelt in an area of outstanding natural beauty enjoyed by many villagers and visitors to the area should be kept as it is. The Wey Navigation is used by holiday craft and local fishermen and many birds can be seen in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/1866  **Respondent:** 17289697 / Carolyn Sanson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
This area of Send is totally unsuitable for building 60 new homes as access via Tannery Lane from Send Road is very dangerous and the lane itself is narrow. It is also part of the Greenbelt and an attractive area of the village to walk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1868  Respondent: 17289697 / Carolyn Sanson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I do not understand the need for 7000 sq. m. of industrial buildings or warehousing on this site while there are empty sites and warehousing in Slyfield and Guildford itself. Again this planning proposal is in the area of the Greenbelt and many of the roads around Send and Ripley are narrow and cannot accommodate large lorries or vans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1872  Respondent: 17289729 / Carmel Rogers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongharn and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"
• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a
medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this
heritage asset, including their approach from White Lane, must be protected."

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable
closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with
the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any
development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of
Ash Green Road and Foreman Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and
the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green
village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the
historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole
will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision
of a green buffer that maintains separation between the any proposed new development and the properties fronting onto
Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location
and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a
medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this
heritage asset, including their approach from White Lane, must be protected."

**Attached documents:**
- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- 4.3.29 Amend to: " Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

- 4.3.30 Amend to: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend to: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area. Ash Green and Aldershot."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

- 4.3.29 Amend to: " Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

- 4.3.30 Amend to: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

- Policy P3 Amend to: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area. Ash Green and Aldershot."

Attached documents:

Comment ID: pslp172/1874  Respondent: 17290913 / David Grant  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Removal of site A46 and site A47 - I support the removal of these sites. The local infrastructure is already struggling to cope - road conditions, accessibility, utility supply, drainage, local healthcare, etc. are all strained. Maintaining the greenbelt and not developing in this location is the right thing to do.

Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages & Palm House Nurseries traveller site - I object to the removal of these from the Green Belt. The Green Belt is a precious resource and its openness should be protected. There are plenty of other local areas outside of the Greenbelt that could be developed instead.
Development around Normandy generally - the Guildford Road and connecting lanes through Normandy are stretched, particularly at morning and evening times. Further development in the area must be accompanied by improvements to local services and infrastructure. Local schools, healthcare and other facilities, transport (road conditions, Ash railway crossing, etc.) need improvement, and local utilities (power, water, drainage, surface water management, telecom/fibre services, etc.) are all under-capacity and need upgrade if further local development is planned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/201</th>
<th>Respondent:</th>
<th>17291329 / Charmian Leach</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I also object to the proposal that removes Send Business Park from the green belt (policy 2, para 4.3.15) as it is effectively an old non-conforming user in an area of beautiful country side adjacent to the Wey Navigation Canal and there is restricted vehicular access along Tannery lane in both directions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1884</th>
<th>Respondent:</th>
<th>17291329 / Charmian Leach</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Further to the above I wish to object to Clockbarn Nursery, Tannery Lane, policy A42 because:

- a 33% increase in homes from 45 to 60 is simply too much as the local infrastructure cannot cope e.g. access and traffic issues at A247 junction
- surface water flooding, already an issue, will worsen
- continual erosion of the greenbelt.
- it ignores the hundreds of previous objections.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1885  Respondent: 17291329 / Charmian Leach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I wish to object to Land at Garlick’s Arch, policy A43 because:
- there is no proven demand for travelling show people plots in this location.
- there are no “exceptional circumstances” to remove the green belt here and removal will join up Send and Ripley, a key reason for the greenbelt?
- it is currently a flood zone 2 allocation and this proposed development will make it worse.
- at 400 it is clear the number of homes is excessive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1886  Respondent: 17291329 / Charmian Leach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to policy A 58 at Burnt Common because:
- it was deleted from the 2014 draft due to the volume of objections.
- Slyfield and Guildford have vacant industrial space so why build more in the green belt?
- the word “minimum” is a fundamental change from the word “maximum” which was in the 2016 plan and since then there has been a drop in demand for industrial land as evidenced by the 2017 Employment Land Need Assessment reducing
demand to 3.9 hectares for the whole borough? Why then now try and allocate over 10 hectares of green belt to industrial land?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/200  Respondent: 17291361 / Ron Leach  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the proposal that removes Send Business Park from the green belt (policy 2, para 4.3.15) as it is effectively an old non-conforming user in an area of beautiful country side adjacent to the Wey Navigation Canal and there is restricted vehicular access along Tannery lane in both directions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1887  Respondent: 17291361 / Ron Leach  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to Clockbarn Nursery, Tannery Lane, policy A42 because:

- a 33% increase in homes from 45 to 60 is simply too much as the local infrastructure cannot cope e.g. access and traffic issues at A247 junction
- surface water flooding, already an issue, will worsen
- continual erosion of the greenbelt.
- it ignores the hundreds of previous objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1888</th>
<th>Respondent:</th>
<th>17291361 / Ron Leach</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| I wish to object to Land at Garlick’s Arch, policy A43 because:  
  - there is no proven demand for travelling show people plots in this location.  
  - there are no “exceptional circumstances” to remove the green belt here and removal will join up Send and Ripley, a key reason for the greenbelt?  
  - it is currently a flood zone 2 allocation and this proposed development will make it worse.  
  - at 400 it is clear the number of homes is excessive. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1889</th>
<th>Respondent:</th>
<th>17291361 / Ron Leach</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| I object to policy A 58 at Burnt Common because:  
  - it was deleted from the 2014 draft due to the volume of objections.  
  - Slyfield and Guildford have vacant industrial space so why build more in the green belt?  
  - the word “minimum” is a fundamental change from the word “maximum” which was in the 2016 plan and since then there has been a drop in demand for industrial land as evidenced by the 2017 Employment Land Need Assessment reducing demand to 3.9 hectares for the whole borough? Why then now try and allocate over 10 hectares of green belt to industrial land? |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/572</th>
<th>Respondent:</th>
<th>17291393 / Mina Amin</th>
<th>Agent:</th>
</tr>
</thead>
</table>
I have been informed about Guildford's proposal for more than 12,426 homes (plus a buffer of 1,555 homes).

I have done some research and have found out that it is excessive and will result into extra congestion which is already severe. There is evidence that Guildford's population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies so building that many new homes is in fact excessive and will result in needless loss of Green Belt of Guildford.

Please consider this as my objection to the proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/575  Respondent: 17291457 / Bridget Jobson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of new evidence which shows that Guildford’s projections for population growth is flawed and is predicting much higher growth than is likely, PLEASE can you reconsider your plan to build so many homes and especially on Green Belt land. There is evidence that Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and increased traffic congestion. It cannot be justified in what is already a highly congested borough.

There is evidence that Guildford’s population growth predictions are overestimated by about 40% because of under-recording of students leaving at the end of their studies.

Please LISTEN to the evidence and re-calculate your projections based on up-to-date evidence.

Once Green Belt land is gone - it is gone for ever. What will you say to your Grandchildren when they ask why Guildford is so busy and congested and horrid to live in?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/204  Respondent: 17291521 / Barbara Phillips  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I feel that the villages of Ripley & Send are being targeted by the Local Plan for overdevelopment on Green Belt land, in flood areas, creating even more traffic gridlock when there are other more suitable sites available without destroying communities and creating mayhem on the local roads and surrounding area. I therefore strongly object to the above Policies A43 and A58.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1895  Respondent: 17291521 / Barbara Phillips  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A58 relating to Land at Burnt Common, London Road on the following grounds:

- Traffic in the area is already chaotic and the roads are constantly gridlocked with traffic - to create even more cars on the road in this area will only cause utter bedlam and no doubt more accidents. The infrastructure cannot cope with any more vehicles - in particular the larger vehicles used on an industrial or warehouse development.

- There is no necessity for another industrial/warehouse development in a Green Belt area when there are enough industrial/warehouse facilities not being used locally outside of the Green Belt.

- The village of Ripley and Send have a defining boundary and with this overdevelopment it will all merge into one, which goes against the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1899  Respondent: 17291553 / James Hitchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:

i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and

ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1912  Respondent: 17291553 / James Hitchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1909  Respondent: 17291553 / James Hitchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1916  Respondent: 17291553 / James Hitchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1897</th>
<th>Respondent: 17291553 / James Hitchings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan, therefore GBC are not following their own guidelines and objectives.
Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1904  Respondent: 17291553 / James Hitchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1898  Respondent: 17291553 / James Hitchings  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

**I object to the lack of proper infrastructure planning for sites (A43 and A42)**

The Foreword to the plan by Paul Spooner includes on page 5:

> "We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan".

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/580  Respondent: 17291553 / James Hitchings  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

**I object removing Send Business Park from the Green Belt (4.3.15).**

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp173/205  Respondent: 17291585 / John Phillips  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I feel that the villages of Ripley & Send are being targeted by the Local Plan for overdevelopment on Green Belt land, in flood areas, creating even more traffic gridlock when there are other more suitable sites available without destroying communities and creating mayhem on the local roads and surrounding area. I therefore strongly object to the above Policies A43 and A58.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1907  Respondent: 17291585 / John Phillips  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A58 relating to Land at Burnt Common, London Road on the following grounds:

• Traffic in the area is already chaotic and the roads are constantly gridlocked with traffic - to create even more cars on the road in this area will only cause utter bedlam and no doubt more accidents. The infrastructure cannot cope with any more vehicles - in particular the larger vehicles used on an industrial or warehouse development.

• There is no necessity for another industrial/warehouse development in a Green Belt area when there are enough industrial/warehouse facilities not being used locally outside of the Green Belt.

• The village of Ripley and Send have a defining boundary and with this overdevelopment it will all merge into one, which goes against the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/206  Respondent: 17291617 / Matthew Phillips  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I feel that the villages of Ripley & Send are being targeted by the Local Plan for overdevelopment on Green Belt land, in flood areas, creating even more traffic gridlock when there are other more suitable sites available without destroying communities and creating mayhem on the local roads and surrounding area. I therefore strongly object to the above Policies A43 and A58.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1911</th>
<th>Respondent: 17291617 / Matthew Phillips</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A58 relating to Land at Burnt Common, London Road on the following grounds:

- Traffic in the area is already chaotic and the roads are constantly gridlocked with traffic - to create even more cars on the road in this area will only cause utter bedlam and no doubt more accidents. The infrastructure cannot cope with any more vehicles - in particular the larger vehicles used on an industrial or warehouse development.

- There is no necessity for another industrial/warehouse development in a Green Belt area when there are enough industrial/warehouse facilities not being used locally outside of the Green Belt.

- The village of Ripley and Send have a defining boundary and with this overdevelopment it will all merge into one, which goes against the purpose of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/207</th>
<th>Respondent: 17291649 / Ian Phillips</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I feel that the villages of Ripley & Send are being targeted by the Local Plan for overdevelopment on Green Belt land, in flood areas, creating even more traffic gridlock when there are other more suitable sites available without destroying communities and creating mayhem on the local roads and surrounding area. I therefore strongly object to the above Policies A43 and A58.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1915  Respondent: 17291649 / Ian Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A58 relating to Land at Burnt Common, London Road on the following grounds:

• Traffic in the area is already chaotic and the roads are constantly gridlocked with traffic - to create even more cars on the road in this area will only cause utter bedlam and no doubt more accidents. The infrastructure cannot cope with any more vehicles - in particular the larger vehicles used on an industrial or warehouse development.

• There is no necessity for another industrial/warehouse development in a Green Belt area when there are enough industrial/warehouse facilities not being used locally outside of the Green Belt.

• The village of Ripley and Send have a defining boundary and with this overdevelopment it will all merge into one, which goes against the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1919  Respondent: 17291745 / Sophie Wooliscroft  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8].
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a].
- adds to air pollution in neighbouring areas, which already exceeds safe EU limits.
- further residential houses in this area will continue to swell the already overloaded peak time traffic on many major roads in the area.
- trains to London from Guildford station are already very over-crowded as peak-time, many times you cannot even get onto the train service never mind trying to get a seat. More people living in the area and using these facilities will further compound the problem.
- public facilities such as schools & leisure centres are currently very busy and over-crowded, significant population rises in the local area will create an overwhelming burden on their resources & facilities.

I cannot emphasise enough the traffic problem that already exists around Guildford in general, many locals have to spend hours stuck in this traffic whilst they attempt to go about their daily lives. In my opinion, there should be no further significant increase in housing in the area until all roads are upgraded to cope with the existing levels of traffic and then a sensible-plan put in place and delivered in order to cope with the expected increase in traffic. This must be Prior-To building any significant further housing, not agreed to on a promise with a developer and then not delivered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1941  Respondent: 17292289 / Susan Lewis  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England's forthcoming boundary review [para. 4.3.8].
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion - particularly around the hospital and A&E - and also encourage rat-running through residential areas such as Compton village.
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]. Accessing the A31 from the top end of Down lane will become impossible.
- adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/211</th>
<th>Respondent: 17293025 / Donna Deam</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp172/1974  **Respondent:** 17293025 / Donna Deam  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/1976  **Respondent:** 17293025 / Donna Deam  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/1967  **Respondent:** 17293025 / Donna Deam  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlick’s Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects:
i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and
ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1975   Respondent: 17293025 / Donna Deam   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [than the Burnt Common site did]
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs

Since A58 Burt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites...
(which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

**I object to the proposal for a Waste Management Facility in Green Belt (A58)**

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/601</th>
<th><strong>Respondent:</strong></th>
<th>17293025 / Donna Deam</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**I object to the extended development in the Green Belt (Policy P2, Site A43)**

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are **no exceptional circumstances** for this site being removed from the Green Belt, as required by the National Planning Policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/1971</th>
<th><strong>Respondent:</strong></th>
<th>17293121 / Glyn Nicholson-Ross</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to your proposals for an increase in the already worryingly high number of homes to be built in Tannery Lane as this would cause unacceptable levels of traffic in this area. I also feel that the proposed development would have a detrimental effect on the Papercourt Nature Reserve which plays an important part in the conservation of birds, animals and plants.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1972  Respondent: 17293121 / Glyn Nicholson-Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to your loading this North East corner of your Borough with an unfair amount of development whilst removing planned development from other areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1968  Respondent: 17293121 / Glyn Nicholson-Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to your plans to increase the development in the Garlick's Arch area particularly as you have shown nowhere in the plan why you feel this development is necessary. The area falls within Green Belt land and, as such, you need to show exceptional need before allowing development to happen. If your proposals are allowed to go ahead it will mean that Clandon .. Ripley and Send simply merge together into one expanse of buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/603  Respondent: 17293121 / Glyn Nicholson-Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You have established a need over the entire Borough for eight plots or pitches for Travelling Showpeople to include storage facilities along with housing. Again, this not appropriate use of Green Belt land and furthermore why is 75% of this need included in your plans for Ripley? I object strongly to this unfair allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/602  Respondent: 17293121 / Glyn Nicholson-Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You have established a need over the entire Borough for eight plots or pitches for Travelling Showpeople to include storage facilities along with housing. Again, this not appropriate use of Green Belt land and furthermore why is 75% of this need included in your plans for Ripley? I object strongly to this unfair allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1982  Respondent: 17293633 / Raymond Rogers  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongharn and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham
b) A331/A323 intersection
c) A31/White Lane junction

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongharn and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- 4.3.29 Amend to: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

- 4.3.30 Amend to: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

- Policy P3 Amend to: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area. Ash Green and Aldershot."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

- 4.3.29 Amend to: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

- 4.3.30 Amend to: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

- Policy P3 Amend to: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area. Ash Green and Aldershot."

Attached documents:

Comment ID: pslp172/1991   Respondent: 17293921 / William Amison   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/1992  Respondent: 17293985 / Jennifer Nockolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/624  Respondent: 17294049 / Genesis Town Planning (Paul White)  Agent: Genesis Town Planning (Paul White)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
For a plan to be sound it has to be consistent with national planning policy. However we disagree that policy P2 and its lower case policy explanation at paragraph 4.3.18 fully reflects green belt policy guidance in paragraph 89 of the NPPF.

We act on behalf of Sandiacre Nurseries a local wholesale horticultural grower and have submitted a planning application for a glasshouse development in Guildford Borough in the green belt which is under consideration and pending a decision.

Adopted local plan policy RE2 on green belt does not properly reflect guidance in the NPPF. New wording has therefore been proposed in local plan policy P2 to reflect the NPPF but in our view this new wording still requires amendment.

Paragraph 89 of the NPPF lists 6 categories of development which are not inappropriate development in the green belt. We accept draft Policy P2 (2) states that proposals will be permitted where they are consistent with the exceptions listed in national planning policy but the policy and its reasoned justification at paragraph 4.3.18 does not recognise the NPPF guidance which has no requirement in the agriculture and forestry building exception to demonstrate that the building has to preserve the openness of the green belt and is not conflict with the purposes of including land within it.

In short, the category of exception in paragraph 89 of the NPPF for agricultural and forestry buildings is entirely unqualified regardless of size or location and is not subject to any proviso or limit as to the size of the building or its impact on openness as the other 5 categories are or the list of other forms of development in paragraph 90 are.

Under NPPF policy the physical presence of an agricultural building in the green belt should not therefore in itself be regarded as harmful to its openness or to the purposes of including land in the green belt. This has not however been clearly expressed in paragraph 4.3.18 which states that ‘…. The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land subject to the impact on the openness of the green belt’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

In our view, the reasoned justification to policy P2 in paragraph 4.3.18 should therefore be revised as follows:

‘Whilst most forms of development are considered inappropriate in the green belt, national planning policy lists certain exceptions which are not inappropriate. These are set out in paragraphs 89 and 90 of the national planning policy framework. The exceptions listed include development such as new buildings for agriculture and forestry which are entirely unqualified in terms of size of building, location or impact on openness and certain other forms of development including the redevelopment of previously developed land subject to their impact on the openness of the green belt’.

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1998  Respondent: 17294177 / Carolina Moh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1999  Respondent: 17294209 / Christina Moh  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2000  Respondent: 17294241 / Kenneth Michael Smart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2001  Respondent: 17294273 / Beryl Barton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2003  **Respondent:** 17294305 / Susan Jackett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2004  **Respondent:** 17294337 / Ken Johnson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2006  Respondent: 17294369 / B Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2007  Respondent: 17294401 / Nikki Hislop  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2008  Respondent: 17294433 / Derek Brian Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2009  Respondent: 17294497 / Keith Crean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2010  Respondent: 17294529 / Lynn Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2012  Respondent: 17294561 / J Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2014  Respondent: 17294593 / Roy Fiander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Comment ID: pslp172/2022  Respondent: 17294657 / Caroline Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2023  Respondent: 17294689 / Alice Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2032  Respondent: 17295233 / Robert C. Mc Dermoon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp173/215  **Respondent:** 17295265 / Brian McGee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A37, 38, 40, 42, 44 & 45 – My Objections

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/2034  **Respondent:** 17295265 / Brian McGee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).
A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much. Overall housing need is for single and two person households at affordable rents with good public transport access, not commuter estates.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.

5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.

6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being
generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2040  Respondent: 17295265 / Brian McGee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits … “we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:
- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/65  Respondent: 17295265 / Brian McGee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Non-plan Items – My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”
The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2036  Respondent: 17295297 / wendy Stephens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2039  Respondent: 17295361 / Elaine Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policies A37, 38, 40, 42, 44 & 45 – My Objections

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2062  Respondent: 17296321 / Robyn Cormack  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2063  Respondent: 17296321 / Robyn Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed...
23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.
25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2064  Respondent: 17296321 / Robyn Cormack  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptabale since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately
half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/626   Respondent: 17296321 / Robyn Cormack   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits … “we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and /or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see
how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:

- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/68</th>
<th>Respondent:</th>
<th>17296321 / Robyn Cormack</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Non-plan Items— My Objections**

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

**Cumulative impact of changes – My Objections**

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

**Duty to Cooperate – My Objections**

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

Yours sincerely,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2065</th>
<th>Respondent:</th>
<th>17296385 / F.M Standford</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp173/220  **Respondent:** 17296417 / Simon Wilcockson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policies A37, 38, 40, 42, 44 & 45 – My Objections**

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/2066  **Respondent:** 17296417 / Simon Wilcockson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2067</th>
<th>Respondent:</th>
<th>17296417 / Simon Wilcockson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.
19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/630  Respondent: 17296417 / Simon Wilcockson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits … "we forecast that there will also be an absolute increase in overall traffic volumes" and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:

- is less than 2 vehicle wide in places
-does not have continuous footpaths
-has several sharp bends
-has a hump-backed bridge with poor site lines
-has a very difficult junction to access the station
-is largely unlit
-has a primary school
-is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp17q/69  Respondent:  17296417 / Simon Wilcockson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Non-plan Items– My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which
overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2070</th>
<th>Respondent: 17296449 / Jemma Thompson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2076</th>
<th>Respondent: 17296481 / Stephen Johnson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2078</th>
<th>Respondent:</th>
<th>17296577 / Danny Stephens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 &amp; para. 4.1.9], which:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&amp;E – and will also encourage rat-running through residential areas</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2081</th>
<th>Respondent:</th>
<th>17296673 / David Ryan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 &amp; para. 4.1.9], which:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&amp;E – and will also encourage rat-running through residential areas</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2086  Respondent: 17296737 / Lucinda Lockett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a
development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of
  Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion –
  particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local
  network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2087  Respondent: 17296769 / Pauline Creiek  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2092  Respondent: 17296993 / Patricia Reed  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2100  Respondent: 17297121 / Graham Boxall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/75  Respondent: 17298785 / Ian Annis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

NO, There is still a gross over-estimate on the number of housing units required in the region and double the historical rate of about 350 units per year built in the area. The only minor revisions section 3.1 and S2 still shows 654 units per year or 12,426 homes and double the amount actually required in the community.

The number of units of 12,426 also contradicts badly the estimated growth of people expected in section 2.3 showing an additional 20,000 residents in the time frame, which then means an average occupancy of 1.6 - that is not what is reflected in the plans for the type of development and property sizes which are more likely to have 2 to 4 occupants per housing unit.

The exaggerated housing requirement and low occupancy rate given in your own evidence clearly shows this is a massive over-estimate on the actual number and size of developments required in this area let alone any regard to the transport infrastructure already at crisis point along the A3 and through Guildford on a regular basis.

The number of housing units must still be massively revised downwards or justification regarding the actual number of people and occupancy rate and size of units expected as these currently do not justify the size and scale of new development in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/76  Respondent: 17298785 / Ian Annis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Apart from the over exaggeration and estimate of housing units required (12,426 homes are not justified even for an over estimated 20,000 extra residents as this would assume many 1 bed flats and not 1,000's of 3/4 bed homes).

The combination of site A25 Gosden Hill encroaching higher up the A3 in the last plan and the introduction of A43/A43a Garlicks Arch in Send completely destroys the very essence of the Green Belt reasoning to stop urbanisation and the joining of distinct town/village boundaries. Effectively the plan as it stands destroys the Green belt protection zone between Guildford/Burpham and the villages of Send and West Clandon effectively become part of Guildford in a very visual way. This is over-development of the Golden Hill site which should be scaled back significantly leaving more green belt land between it and the villages north of it, any A3 north/south access should be at Gosden Hill/Burpham interchange along with any Slyfield redevelopment of the access to the A3 and Garlick's Arch should be removed from the plan completely along with any plans to turn the A247 Clandon Road junction into a north/south junction which would significantly increase the traffic flow through the villages of West Clandon/Send and Ripley and more accidents at the accident hot spot connecting to the A3.

Over development of A25 and A43(a) completely go against the principle of the green belt policy to stop urbanisation and connecting of surrounding villages into key towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/228   Respondent: 17299681 / Aileen Aitcheson   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is proposed that East Horsley is to be “inset” from the Green Belt. This proposed change in settlement boundaries means that the East Horsley settlement area will increase by 37%. At the moment, one hundred houses are proposed near East Horsley station and over two thousand on the former Wisley Airfield, only about one mile from the East Horsley parish boundary. The site at Wisley has increased to include two more farms!

East Horsley is a small village which does not have the infrastructure of roads, rail, parking, medical facilities or schooling to support such a huge increase in population. Fifty seven percent of new housing proposed is on land that is currently categorised as Green Belt. This is flouting government law which established Green Belt to protect the countryside for future generations.

While the ONS forecasts population for growth for Guildford at 10.4% over the Local plan period, GBC proposes to increase the housing stock by 22%. Since Brexit, forecasts of increasing population numbers have been reduced, yet GBC are continuing to predict massive increases in population, which quite frankly, does not make sense.

Again, I wish to register my strong opposition to the changes proposed by GBC is their latest draft of the Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/229</th>
<th>Respondent:</th>
<th>17299713 / Dawn Kelly</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am opposed to the amended 2017 plans for the Horsley area as there is hardly any change from the 2016 plans which are ridiculously excessive. We need to protect our countryside and greenbelt. Changing a greenbelt area to an extended village is not necessary. The plan to establish FOUR housing developments (rather than 6) remains excessive to population growth.

The area would suffer considerably with another 2000 homes, sheltered/care homes, gypsy/traveller pitches, retail parks and schools on the former Wisley Airfield and surrounding fields.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2120</th>
<th>Respondent:</th>
<th>17299809 / Catherine Colby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I see there is another planning piece that has gone in and I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons as outlined below.

Please why can't you just allow a few more family homes in this peaceful family area, why this insistence on trying to create a massive new village that will ruin the infrastructure and all we hold dear in this beautiful area we live in? My 20 points are:-

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic

7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.

- The associated traffic increase from the RHS has not been taken into account.
- The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account. It is a nightmare getting anywhere in these days as you know.

1. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis. My children have been injured just by current local traffic on their bikes and refuse to cycle now as just too dangerous.

2. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

3. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrain the site significantly in terms of building heights etc.

4. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

5. Opportunity (3) should be common to all sites and is not unique to this site

6. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting.

7. I object to the removal of additional 3.1 ha from the green belt without any justification

1. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

2. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

3. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

4. I object to the extension of the plan period by 1 year as it has not been identified as a major change

5. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

1. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616?

This last point is one of a number of glaring examples of why the plan is unsound and not fit for purpose and alongside my other points needs to be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the loss of more green belt with the increased area.
I object to the increased area making it adjacent to Upton farm.
It is adjacent to a3/m25 junction which would lead to traffic using Wisley roundabout into an already congested and dangerous entry to the m25 slip road.
Local roads would not cope with increased traffic and buses in the narrow roads.
I object to the plan for the above reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 (Tannery Lane, Send) because

Subsequent to the previous plan, you have further increased the amount of planned homes from 45 to 60 which is at odds with hundreds of previous objections to this development;

It will place the local roads under further significant strain. This road connects to Send Road (A247) which is a traffic hotspot during peak times with significant load heading into Woking or heading to the A3. Traffic turning into and leaving Tannery Lane causes severe delays and this situation could only worsen with this proposed development;

It erodes the Green Belt in our village and puts pressure on local house values.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2139  Respondent: 17300737 / Katy Di Rienzo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 (Garlicks Arch, Send Marsh) because

Again, the local infrastructure could not support such a change and would significantly worsen access to the A3 and local traffic issues but beyond that, local schools and medical amenities are not at a level where they could deal with such an increased local populace.

Again, it ignores the thousands of previous objections made by local people;
There is no proven demand for Travelling Showpeople plots in this location

I find it difficult to understand why, rather than listen to the thousands of previous objections from local people, Guildford Borough Council have in fact far worsened the proposed developments for Send Village and associated green belt within the recent iteration of the Local Plan and really demonstrates an authority that is not listening.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2137  Respondent: 17300737 / Katy Di Rienzo  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object categorically to Policy A44 (Winds Ridge/Send Hill, Send) because

The local infrastructure cannot support an increase of residents and associated traffic at that level; Send Hill in parts is a country, single lane road with poor access to surrounding areas and could not facilitate the proposed increase in levels of traffic thereby creating access issues;

The local school(s) are not able to accommodate an increase in pupils at this level and are struggling to meet current demand;

It ignores hundreds of previous objections made;

There is no proven demand for traveller pitches in this location and the introduction of such pitches will have an impact on local house values;

It is rural, agricultural land and not meant for this type of development and this only works to erode the Green Belt and the glorious views of local our precious countryside;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/651  Respondent: 17300801 / Tom Saunders  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am a young professional, born in Guildford and currently residing as a homeowner in Burpham with concerns over the council's attitude towards current and potential future residents of the Borough's quality of life. I wanted my comments to be acknowledged with regard to the proposed local plan on both a subjective and objective basis as I would think it is people of my demographic you are looking to attract and keep in the area.

I am not overly against the building of new houses/flats, as I am led to believe we have a housing crisis in this country so understand the desire for growth, however I am concerned that the proposed development at Gosden Hill Farm will place too much of a burden on a local infrastructure (i.e. the roads in particular) which is already overwhelmed at peak times. I would urge the council to ensure that transport infrastructure is improved BEFORE any new housing development and not just to address the current deficit that is already evident, but to adequately provision for anticipated future growth beyond Gosden Hill Farm.

I have found it unclear from what I have seen in the plan about timelines for Gosden Hill Farm and the new southbound slip roads for the A3, but my concern stems from observing housing development near the train station and by the cricket ground on Woodbridge Road. Given that I would expect each household to have between 1 and 2 cars, how will the current road system cope with these new vehicles when people move in? It appears the council are (rather admirably) trying to address a housing crisis but leaving infrastructure as an afterthought, kicking infrastructure down the track for what will become a future problem; it will not simply go away! (and potentially drive people away from the area) Why let the current system get worse before trying to improve it?

While the borough's road system has been much maligned for as long as I have been alive, one positive I can say about where I live on Ladygrove drive, Burpham is the northbound slip roads onto and off of the A3. However, the following list are subjective observations of the problems I have when travelling to and from the south:

- Peak time congestion from Clay Lane all the way into the town centre. I may be inclined to take public transport but it isn't efficient enough: the bus takes too much time weaving around residential areas and then gets stuck in the same traffic either on London Road or Parkway anyway. This congestion is usually even worse on the way back home from work and what should be a 15 minute journey regularly turns into an hour.
- I often use Farnham Road Car Park, either to use the train for my client based work or because my company holds parking permits for Farnham Road when I am needed in our main Guildford Office. Due to the one-way system being gridlocked constantly at peak times, I am forced to join the A3 from the A25 for all of 30 seconds before I come off at the University roundabout to facilitate easier access to Farnham Road's Entrance. Either a southbound slip at Burpham or a road that better connects the A25 to the University roundabout (or both!) would be a clear way to alleviate traffic and improve traffic flow as I am sure I am not the only one who has a similar route.
- I often travel to Portsmouth at weekends and the issue of no southbound slip raises it's head once again as I am illogically forced to drive through Guildford and join congestion once again trying to then enter the A3. Southbound travel from north of Guildford centre is just horrendous.
- As mentioned earlier, I use the trains for work from time to time. I understand that the service through Guildford to Waterloo is one of the most crowded in the country and I can see why. It is on a par with, if not worse than a London tube carriage and again, expansion needs to be considered before more houses. I am not sure where the inhabitants of the new flats by the train tracks were expected to be accommodated by the transport system? A new station at Merrow will surely just add to the overcrowding rather than alleviate it.

Adding new houses at Gosden Hill will make these problems worse, so it is imperative that improvements are made before housing starts to be developed to ensure the high quality of life survey results Guildford has been receiving in recent times continues and to ensure the future prosperity of the area. I am afraid that if the council executes the plan in the same way they executed the box park 'village' last year, then the plan will be an unmitigated disaster. Although, the village has improved marginally since it's refurbishment, it appears that local resident views are not given the consideration they deserve and I would anticipate University students not staying in the area after graduation if the correct level of engagement is not achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2143  Respondent: 17300865 / Felice Di Rienzo  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 (Tannery Lane, Send) because

Subsequent to the previous plan, you have further increased the amount of planned homes from 45 to 60 which is at odds with hundreds of previous objections to this development;

It will place the local roads under further significant strain. This road connects to Send Road (A247) which is a traffic hotspot during peak times with significant load heading into Woking or heading to the A3. Traffic turning into and leaving Tannery Lane causes severe delays and this situation could only worsen with this proposed development;

It erodes the Green Belt in our village and puts pressure on local house values.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2144  Respondent: 17300865 / Felice Di Rienzo  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 (Garlicks Arch, Send Marsh) because

Again, the local infrastructure could not support such a change and would significantly worsen access to the A3 and local traffic issues but beyond that, local schools and medical amenities are not at a level where they could deal with such an increased local populace.

Again, it ignores the thousands of previous objections made by local people;

There is no proven demand for Travelling Showpeople plots in this location

I find it difficult to understand why, rather than listen to the thousands of previous objections from local people, Guildford Borough Council have in fact far worsened the proposed developments for Send Village and associated green belt within the recent iteration of the Local Plan and really demonstrates an authority that is not listening.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp172/2141</th>
<th>Respondent: 17300865 / Felice Di Rienzo</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A44</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object categorically to Policy A44 (Winds Ridge/Send Hill, Send) because
The local infrastructure cannot support an increase of residents and associated traffic at that level; Send Hill in parts is a country, single lane road with poor access to surrounding areas and could not facilitate the proposed increase in levels of traffic thereby creating access issues;
The local school(s) are not able to accommodate an increase in pupils at this level and are struggling to meet current demand;
It ignores hundreds of previous objections made;
There is no proven demand for traveller pitches in this location and the introduction of such pitches will have an impact on local house values;
It is rural, agricultural land and not meant for this type of development and this only works to erode the Green Belt and the glorious views of local our precious countryside;

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2159</th>
<th>Respondent: 17301089 / Amanda Alexander</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I also object to the 1700 homes at Gosden Hill, site A25. Again this huge amount of homes, with no facilities is disproportionate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2162</th>
<th>Respondent: 17301089 / Amanda Alexander</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I also object to the 1700 homes at Gosden Hill, site A25. Again this huge amount of homes, with no facilities is disproportionate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition, I object to the proposed development on site A42. On the other side of me, I have Tannery Lane, site A42, with the increase from 46 to 60 homes.

What about the affordable housing which is not clearly stated?!

Already at the traffic lights in Send, traffic is held up for several changes of lights. The area cannot take more traffic on the roads.

Already we are blocked in when the newly extended primary school parents block our access. If there was to be a fire or ambulance needed, our homes cannot be accessed as it is. The school can't take any more families. The Doctor's surgery cannot take any more load.

It is not right that 40% of development is in this area, so near to Send Marsh and Wisley Airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2156  Respondent: 17301089 / Amanda Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly, I object to development on site A43, Garlic Arch is STILL Green Belt land and this amount of development, 1500-1999 homes, an INCREASE of 400 houses, is inappropriate for the area. The addition of six Traveller Plots, amongst/as well as all these houses in a rural area is completely harmful for wildlife and people alike.

Why do we need 6 new traveller sites? It is disproportionate and unfair to put such a heavy load, all in one area. I strongly object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2157  Respondent: 17301089 / Amanda Alexander  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Secondly I object to the plans for site A58. I live near Burnt Common, site A58, and the unclear information about industrial floor-space is another considerable worry.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

• We simply do not have the road infrastructure to deal with large new developments & the additional road traffic this will bring. Ripley high street is already gridlocked every rush hour, twice a day with vehicles trying to get in & out of Newark Lane and to and from the A3. It’s already way over capacity, so to suggest a further cars and vans/lorries is completely unfeasible. How will small high streets such as Send and Old Woking be able to cope with this volume of additional traffic for families getting to and from Woking – White Rose Lane is yet another road that already is jam-packed?

• Air pollution will rise substantially with this proposed increase to road traffic

• Woking station doesn’t have the capacity to deal with additional parking on this scale to cope with this amount of additional commuters

• No bus services run prior to rush hour to get people to Woking/Guildford stations

• Send Villages Medical Centre: Its already a nightmare getting an appointment to see a doctor – will you be building an additional facility of larger capacity in Ripley and if so where?

• Any development at Site A43 Garlicks Arch would be on Green Belt land, and there is no identified or exceptional need within the Local Plan documentation

• The inclusion of 6 Travelling Showpeople plots with associated storage facilities is entirely inappropriate in a rural environment within the Green Belt and there is no identified need within the Local Plan

• The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. The Plan is self-inconsistent and therefore not properly constituted.

• The potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. The plan states that “if the [Traveller sites] remains unsold, the future use of the land should have regard to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with specific consideration of the use of the land for affordable housing”. So even more travellers pitches and houses, which is unjustified.

• Section 4.2.22 of the Plan states that “Sufficient sites are identified within the Local Plan [for] 8 plots for Travelling Showpeople” So why do 75% of them have to be in Ripley? This is unbalanced and unfair.
The removal of site A46 from the Plan (with its proposed 1100 houses) has left the Plan even further unbalanced against the North East of the Borough with over 40% of the development proposed in this small area of Green Belt, all within just 3 miles of Send Marsh.

The potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3509  Respondent: 17301249 / Elliot Sinclair  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of the new flawed evidence, Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of green belt and character whilst increasing congestion. This cannot be justified in our heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2200  Respondent: 17301377 / Amanda Obrien  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new draft remains objectionable for three main reasons:

1. Based on Guildford Borough Council’s own figures, marginal changes such as these would still leave 56.7% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.
2. The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.
3. No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a
Local Plan should intend. It would not be difficult (e.g. with the help of the draft West Horsley Neighbourhood Plan) to set out a proper, more integrated vision for this part of the borough. Without this, the plan is not a plan for the Horsleys in any practical sense.

The Inspector will also want to have regard to the feeling among Horsley residents that this limited approach is deliberate – driven by a concealed wish to turn their community into new dormitory town. Plausible claims have been made of political bias by a Council leadership representing the western end of the borough, which is less threatened by London urban sprawl.

The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents. The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.

The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route.

These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2204  Respondent: 17301377 / Amanda Obrien  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the new local plan, my reasons are as follows;

Sites A36-41 (East and West Horsley)

This submission focuses on changes made to the 2016 draft Local Plan. In the case of Sites A36-41, the changes are minimal. This ignores the high volume of serious objections submitted to this part of the plan.
The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/252  Respondent: 17301409 / JENNIFER BEDDOES  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to a number of the policies contained in the above plan.

1. The existing Send Business Park is a good example of the use of buildings in a rural environment. The significant changes in the plan will change the feel of the area and the natural environment……..the buildings are too close to the River Wey Navigation.

The single lane highway access in Tannery Lane is already heavily used by cars and commercial vehicles. With development, it is inevitable that the traffic flow would be substantially increased by traffic from the new marina and the proposed Clockbarn development. The road lacks a footpath and has no public transport links.

For these reasons the site should not be expanded or classified as a strategic employment area.

1. I object to the proposed changes to Send Business Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2206  Respondent: 17301409 / JENNIFER BEDDOES  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the development of Burnt Common. The potential huge strategic employment site at Burnt Common will inevitably cause significant increases in traffic in the area. This development combined with Garlick’s Housing site will result in the urbanisation of the village at its west boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/255  Respondent: 17301473 / Lynda Turner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our villages raised a huge number of valid objections by our residents in the 2016 consultation and yet the Borough Council have increased the housing, travelling/showpeople pitches and industrial development allocations despite a reduction in the boroughs’ overall target. This shows we have not been listened to, our concerns ignored.

With the following proposals – 3,700 houses at Gosden Hill Farm and Wisley airfield (Policy A35) within the vicinity and for proposals for the village of Send, Send Marsh/Burnt Common to have an extra 500 homes, 10 travellers pitches, 7,000 sqm. Of industrial development and slip roads to A3, I HEREBY STRONGLY OBJECT TO EVERY SINGLE ONE OF THESE PROPOSALS ON THE GROUNDS THAT THEIR SEVERE AND ADVERSE ENVIRONMENTAL (INCLUDING ATMOSPHERIC POLLUTION FROM THE INCREASED TRAFFIC) IMPACT AND UNJUSTIFIED SACRIFIC OF PRIME AGRICULTURAL GREEN BELT AND HISTORIC WOODLAND

PLEASE ENSURE THAT THIS LETTER IS BROUGHT TO THE ATTENTION OF THE GOVERNMENT’S PLANNING INSPECTORATE AND UNLIKE THE JUNE 2016 PROCESS MAKES OUR OBJECTIONS IN THIS CONSULTATION WORTHY OF ITS NAME

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2217  Respondent: 17301473 / Lynda Turner  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A25 Gosden Hill Farm

I have objected before to the 2,000 houses proposed for this site. The Plan to reduce the number of houses to 1,700 would not materially reduce the huge, detrimental impact that this development would have on the A3 and other local roads.

I therefore strongly object to this ill thought out proposal which would generate additional traffic along the narrow A247 Clandon Road and Send Barn Lane/Send Road leading to Woking.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/2216  **Respondent:** 17301473 / Lynda Turner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

Policy A43 Garlicks Arch

I have objected to the proposed development of 400 houses on Green Belt and good agricultural land. This new policy adds 8 travelling-show people pitches to the development making this development even even more inappropriate for this area. The Borough Council, 3 years ago, actively turned down a planning application from ‘Old lands’ to build 25 homes in the same location. So the Council cannot include this policy within the plan and maintain that it applies consistent and good policy.

I strongly object to the revised proposal for following reasons

1. The village has no shops or other infrastructure to support the development.
2. Additional traffic generated would create huge congestion on our already over crowded roads in Send, Send Marsh, Burnt Common and Ripley
3. No exceptional circumstances exist to destroy this Green Belt land and ancient woodland in the [illegible word]
4. There is no proven demand for travelling/show people in the area
5. The village of Send Marsh/Burnt Common, and Ripley would have their distinct characteristics destroyed

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/2214  **Respondent:** 17301473 / Lynda Turner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

Page 2359 of 2988
New Policy A58 – Land around Burnt Common Warehouse, London Road Send P2 and A58.

This new policy A58 seeks to increase the area of land to be extracted from the Greenbelt for a minimum of 7,000 sq.m of employment floorspace. So I strongly object to this proposal on the grounds that there is no proven need to allocate any Green Belt land within the borough for industrial/warehouse development. This development will have a severe impact not only on the two villages but will create major traffic problems throughout the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/689  Respondent: 17301473 / Lynda Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 – the 654 homes per year that the Plan intends to deliver over the period of 2015 – 2034

This reduced number is still far too high and doesn’t take into account the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in population.

I strongly object to the calculation of assessed need for housing and other development in the area and the vastly disproportionate impact of the Local Plan proposals on the communities in The north of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/259  Respondent: 17302017 / Neil Jones  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly support the removal of sites A46 and A47 in the Flexford area, as this is Green Belt land and I do not believe that the current infrastructure could support these developments.

You propose to remove from the Green Belt homes in Guildford Road, northern end of Glaziers Lane, Walden Cottage and Palm House Nurseries site. As someone who uses this area regularly, I believe that such a move would have a detrimental affect, as a result of the likely higher density development. As well as spoiling the character of the area, it would also reduce the openness of the Green Belt, which I feel is the Council's responsibility to uphold.

You propose to allow the building of up to 10,000 homes within a 10 mile radius of Normandy. I understand the need to build new homes and appreciate that it's very easy to take a "not in my back yard" approach. However, I would urge careful consideration of the negative impact that this could have on one of the council's more rural areas. If this proposal does go ahead, it should be accompanied by a commitment to invest in improvements in the local infrastructure, such as a new road bridge and footbridge at Ash station, to enable the current level crossing to be closed.

Thank you and I would be happy to discuss any of these matters further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A42 - Clockbarn Nursery, Tannery Lane

1. I object to your proposal to increase the 60 homes in place of the 45 homes, which amounts to an increase of 33%. How can you justify this increase?

2. It ignores the hundreds of objections raised by local people already.

3. It will without doubt have a serious impact on traffic levels and traffic problems in Tannery Lane and at the A247 junction.

4. It will also make the erosion of the green belt in Send Village much worse.

5. It will also make surface water flooding, which is already a problem far worse.

6. It will have an effect on the open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2258  Respondent: 17302273 / R Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the A43 changes at Garlick's Arch as follows:

1. YOU have completely ignored the thousands of previous objections made by local people.

2. Why should there be a plot for Travelling Show people in this location when there is 'lc proven demand for this. These people lead a transient lifestyle and therefore there is no need to provide them with a plot of land.

3. You have not provided nor can you justify your reasons for proposing to build on the beautiful permanent Green Belt, there are no exceptional circumstances to allow you to do this.

4. Your proposals will mean our village is 'over developed' and the number of homes excessive.

5. We have beautiful and exquisite ancient woodland that have existed since the time of Elizabeth 1, why do you want to destroy this?

6. These changes will join up Ripley and Send and completely defeat the purpose of the Green Belt.

7. This area is subject to flooding and is currently in flood zone 2 and it is contaminated with lead shot which has built up over the last 50 years.

8. It will generate more traffic that will cause chaos in the local roads of Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp172/2259  Respondent: 17302273 / R Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58 - Burnt Common
My objections are that this was deleted from the 2014 Draft - why have you now resurrected it and added it to the revised proposal?

1. There has been a decline for the need of industrial land - many office buildings and industrial lands stand derelict why build more?

2. Slyfield and Guildford have empty sites and industrial units - USE THESE FIRST. There is no need to build an industrial or warehouse unit in the middle of the Green Belt.

3. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

4. The impact on narrow surrounding country lanes will create traffic gridlock

5. As stated before

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/718  Respondent: 17302273 / R Singleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt, Policy 2 at paragraph 4.3.15
Send business Park now to be taken out of the Green Belt altogether I object to, the proposal to inset Send Business Park from the Green Belt because:
1. As you will be aware this is effectively an old non-conforming user in an area of outstanding countryside which is adjacent to the beautiful Wey Navigation
2. The roads are narrow allowing restricted vehicle access along Tannery Lane in both directions
3. It is inappropriate for further expansion or development at this location and it will detract from the openness of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2268  Respondent: 17302497 / F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2267  Respondent: 17302497 / F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2269  Respondent: 17302497 / F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2263  Respondent: 17302497 / F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2265  Respondent: 17302497 / F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2264  Respondent: 17302497 / F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots…” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

- The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm,… (site allocation A25) [than the Burnt Common site did]”
- The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value.”

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit in lieu is an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/724  Respondent: 17302497 / F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5: “We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan.”

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

The Garlich Arch,Burntcommon,Send & Wisley proposals will have a devestating affect on the quality of life,and pollution from the traffic it would generate,as all these developments will necessitate their traffic to be directed through Ripley,Ripley has already become a by pass for the A3, which on a daily basis has problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/721  Respondent: 17302497 / F Bennett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes affecting Ripley and Send, which make the Plan even worse than the 2016 proposals.

These are my main reasons/ I object on these grounds / …
The Government states that the green belt is safe from this kind of development, we expect them and you to live up to this commitment.
The channel4 dispatches programme on the 10th July gives us great concern about you living up to this commitment, In particular we are concerned about the Send site giving the arrangements with the Builder that Phillip Hammond was shown to have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/723  Respondent: 17302497 / F Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2273  Respondent: 17302753 / Mark & Lucy Ingram  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
strongly object to the following proposals set out in the document:

1) Gosden Hill development of 1700 houses

2) Southbound on- and off- slip roads to service the development and replace the existing off slip road to Burpham.

3) A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2272  Respondent: 17302753 / Mark & Lucy Ingram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

strongly object to the following proposals set out in the document:

Garlick's Arch development of 400+ houses and facilities for travelling showmen

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2270  Respondent: 17302753 / Mark & Lucy Ingram  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

strongly object to the following proposals set out in the document:

Burnt Common strategic industrial development site

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp17q/92  Respondent: 17303201 / Kevin Soobadoo  Agent: Caroline Wilberforce
### Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

NPPF paragraph 182 states that the Local Plan will be examined to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound”.

In relation to Amendment 8 of the Green Belt boundary at Flexford, we have assessed the soundness of the plan in accordance with the relevant parts of NPPF paragraph 182. These include the plan being consistent with national policy and justified using proportionate evidence.

NPPF paragraph 182 also states that the Local Plan should enable the delivery of sustainable development in accordance with the policies in the Framework to demonstrate soundness.

In our previous representations, we commented that retaining ‘Westholme’ in the Green Belt would fail to accord with NPPF paragraph 85. This paragraph states that when defining boundaries, local authorities should define boundaries clearly using physical features that are readily recognisable and likely to be permanent, and not include land which it is unnecessary to keep permanently open.

We concluded that the previously shown Flexford Green Belt boundary was inconsistent with national policy (as the Council had not recognised the permanent physical features surrounding the site) and that retaining Westholme in the Green Belt would fail to accord with the requirements of NPPF paragraph 182.

We are therefore pleased that the Council has since taken our previous representations into consideration and has now amended the boundary to the south west corner of Flexford (Amendment 8) to remove ‘Westholme’ from the Green Belt boundary based on our supporting evidence.

---

### Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Our representations relate to the proposed amendments to the Green Belt boundary at Flexford (the south west corner) and specifically concern Amendment 8, as defined on p420, which would result in the removal of our client’s site, ‘Westholme’ on Green Lane East, from the Green Belt.

We write to support the Council’s further amendments following our representations to the Regulation 19 consultation in July 2016, in which we encouraged the Council to remove the above site from the Green Belt.

**Summary of previous representations**

Our previous representations in July 2016 critiqued the robustness of the three-stage methodology used to assess the contribution in which the open character of Flexford was considered to make to the openness of the Green Belt.
The previous representations were submitted as the proposed Green Belt boundary did not contribute to the essential characteristics of the Green Belt as defined in NPPF paragraph 79 – openness and permanence. Indigo undertook an assessment of the site in the context of the Green Belt and confirmed that the site is surrounded by development and defensible boundaries. The western side of the site is narrower than the eastern side, so there is less open space which contributes to the openness of the Green Belt and there is a large, mature and dense conifer boundary along the northern side which prevents the land from contributing to the openness of the Green Belt all year round. To support our research, we prepared a photo survey of the site from various directions and created maps illustrating the amendments that should be made to the Green Belt boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp173/270  **Respondent:** 17303553 / Anita Fitchie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp173/271  **Respondent:** 17303553 / Anita Fitchie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2312  Respondent: 17303553 / Anita Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/738  Respondent: 17303553 / Anita Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I OBJECT to Policy D3 - Historic environment
I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/735  Respondent: 17303553 / Anita Fitchie Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

Proposed Submission Local Plan: strategy and sites 2017 - Guildford Borough Council Planning Policy Consultations

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/736  Respondent: 17303553 / Anita Fitchie Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/737  Respondent: 17303553 / Anita Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/742  Respondent: 17303553 / Anita Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/743  Respondent: 17303553 / Anita Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of

Page 2378 of 2988
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/747  Respondent: 17303553 / Anita Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/739</th>
<th>Respondent:</th>
<th>17303553 / Anita Fitchie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and...
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.
The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/98  Respondent: 17303553 / Anita Fitchie  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

1. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

2. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
3. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/99  Respondent: 17303553 / Anita Fitchie  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
<table>
<thead>
<tr>
<th><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> (No)</td>
</tr>
</tbody>
</table>

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th><strong>Comment ID:</strong> pslp172/2298  <strong>Respondent:</strong> 17303617 / Peter Warburton  <strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
</tr>
</tbody>
</table>

I object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for the following reasons:

1. I live in East Horsley where local roads would not be able to take the additional traffic from Three Farms Meadow.
2. The infrastructure in East Horsley, including doctor, railway station and parking, would be overloaded by the additional pressure from the inhabitants of Three Farms Meadow.
3. It would involve severe disruption and constraints on the roads in Ockham.
4. I object to the removal of additional 3.1 ha from the green belt
5. I object to the change in green belt boundary to the eastern end of the site
6. I object to the fact that the council has failed to remove this site from the local plan
7. I object to the inclusion of a 10% buffer in the housing number over the plan period.
8. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.

I believe that the housing number is unsound and open to legal challenge.

1. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
2. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/273  Respondent: 17303713 / Andrew Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/274  Respondent: 17303713 / Andrew Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2326 Respondent: 17303713 / Andrew Fitchie Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burnt common and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/770  Respondent: 17303713 / Andrew Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.
I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/766  Respondent: 17303713 / Andrew Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/768  Respondent: 17303713 / Andrew Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/769  Respondent: 17303713 / Andrew Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/774  Respondent: 17303713 / Andrew Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/778  Respondent: 17303713 / Andrew Fitchie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/773  Respondent: 17303713 / Andrew Fitchie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/765  Respondent: 17303713 / Andrew Fitchie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

“Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

1. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford’s circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
3. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/103</th>
<th>Respondent:</th>
<th>17303713 / Andrew Fitchie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2319  Respondent: 17303745 / Christine M Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2318  Respondent: 17303745 / Christine M Macnair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan is self-inconsistent in respect of traveller sites. A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2320  Respondent: 17303745 / Christine M Macnair  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

Comment ID: pslp172/2323  Respondent: 17303745 / Christine M Macnair  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/767  Respondent:  17303745 / Christine M Macnair  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says:  Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/763  Respondent:  17303745 / Christine M Macnair  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan."

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/764  
Respondent: 17303745 / Christine M Macnair  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2713  
Respondent: 17304257 / Obsidian Lands Promotion (Guildford) Ltd (Philip Scott)  
Agent: Obsidian Strategic (Philip Scott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
S2: Borough Wide Strategy

We do not set out in detail here every point of contention with the PSLP Housing Strategy nor do we necessarily object to other individual proposed submission allocated housing sites. Those detailed matters will follow in due course through the Examination.

The main thrust of our objections to Proposed Submission Policy S2 is threefold:

1. Housing Need has been reduced significantly from the July 2014 (Regulation 18) and June 2016 (Regulation 19) versions of the Draft Local Plan (Regulation 18) at the very time when housing need both regionally and nationally appears to be very substantially increasing. We find this approach perplexing and we question its credibility and desirability.

2. GBC's Housing Land Supply and proposed housing allocations have altered dramatically from the July 2014 (Regulation 18) and the June 2016 (regulation 19) versions of the Draft Local Plan. Not only is there a significant reliance on major strategic housing allocations which will take many years to deliver housing, but the housing delivery rates are now weighted to the back end of the Plan period exacerbating still further the previous accrued under-delivery of housing in the borough; and

3. In light of the above, smaller and modest sized sites which are deliverable and which the Local Plan evidence base show can be delivered without causing significant harm, have been omitted from the emerging Local Plan at the very time when they could help GBC meet its (and neighbouring authorities) acute housing

The Borough Council openly acknowledges that it has accrued a very significant housing delivery shortfall moving into the Local Plan review process. In that regard, the Borough Council has approximately 3.2 years supply of housing land against the Government's minimum requirement of 5 years housing land supply.

Despite the context of housing delivery under-performance, GBC proposes to reduce the Plan period by one year and its start date has been rolled forward by 2 years. In this respect, we are concerned that there is no credible explanation offered to indicate why the Plan period has been reduced in mid-Plan making process. This change to the Plan period has also been accompanied by a very significant reduction in the overall housing requirement during the Plan period from 13,860 to 12,426 dwellings (a reduction of 1,434 dwellings). This very sizeable reduction comes precisely at a point in time when housing need at the local and national level is so acute. Furthermore, the proposed change to the Plan period appears to be out of step with the Strategic Housing Market Assessment (SHMA) and the Housing Market Area (HMA) which relate to the period 2013 to 2033.

The West Surrey SHMA itself has been partially updated since the July 2014 Regulation 18 and June 2016 Regulation 19 versions of the Local Plan. We also note that the Guildford Addendum Report (2017) takes account of the latest population and household projections, the latest 'post-Brexit' economic projections, and the 2015 mid-year population estimate. It is highly notable that the Addendum Report has resulted in a reduced Objectively Assessed Need ('OAN') for Guildford borough from 693 homes per year (2013 - 2033) to 654 homes per year (2015 - 2034). We struggle to understand how such a dramatic reduction in assessed housing need in Guildford borough bears any resemblance to the reality of the housing market in this part of the South East of England.

We consider that there are a number of in-principle matters for the examination to address in this regard.

Firstly, given the acute need for housing locally (and regionally) including record need and waiting times for affordable housing, together with significant unmet housing need in neighbouring Woking and Waverley boroughs, we question how such a dramatic reduction in the OAN is credible yet alone desirable? A further matter which we will seek to address at the examination is that Addendum Report appears to relate solely to Guildford borough rather than the wider strategic West Surrey SHMA area. The approach by GBC to calculating the revised OAN must brought in question especially in light of the duty to cooperate obligation.

Finally, on this particular matter, we question whether the approach taken by GBC to housing need and the PSLP's approach to housing delivery through the Plan period is in accordance with the Government's advice contained in the National Planning Policy Framework and the Planning Practice Guidance ('PPG').
The approach to Housing Land Supply through Proposed Site Allocations

GBC's Housing Strategy is heavily reliant upon the delivery of several major draft housing allocation sites to bring forward a substantial proportion of new homes during the Plan period. GBC was also at pains throughout the PSLP committee debating process to assure elected Members, stakeholders, and local communities that the major housing allocations would only come forward when accompanied by necessary on and off-site infrastructure (including, but not limited to, new roads, utilities, and school provision). Consequently, GBC's Housing Strategy in the PSLP (Regulation 19) is predicated on all necessary infrastructure required to facilitate the major housing site being delivered at the front end of housing scheme delivery.

The Housing Strategy has therefore been modified to illustrate that housing delivery on those major sites will be significantly delayed and as a result the PSLP housing strategy assumes a significant weighting of annualised housing delivery towards the back end of the Plan period.

We consider the proposed approach to the borough's housing delivery will only serve exacerbate the acute need for housing (including affordable housing) in the borough which is already failing to perform against local targets and the Government's 5 year housing land performance requirements. Indeed, not only is the Borough Council moving towards an Examination with a sustained housing land supply shortfall when measured against its 5 year housing land supply target but the Council is also proposing a housing delivery strategy which will result in an additional accumulated shortfall of 1000 dwelling units up to 2026 against its own annualised OAN housing target (until the draft allocated major housing sites come on stream from 2026 onwards):

- 2019/2020 200 unit shortfall
- 2020/2021 200 unit shortfall
- 2021/2022 150 unit shortfall
- 2022/2023 150 unit shortfall
- 2023/2024 150 unit shortfall
- 2024/2025 100 unit shortfall.
- 2025/2026 50 unit shortfall.

This annualised shortfall in housing delivery will be greater still if the Examination Inspector finds against GBC's revised OAN methodology.

Despite this lamentable context, sites with potential to deliver housing in the first five years of the Plan period have been omitted from the emerging Local Plan despite being draft allocated from the 2014 draft Local Plan. For example, sites such as Pond Farm and Land South of New Pond Road (Site No. 80 (SHLAA site reference 2241) immediately adjacent to and contiguous with the built form and settlement boundary of Farncombe have been identified as part of the Borough Council's housing evidence base and the Green Belt and Countryside Study as being suitable to deliver new housing.

In this context, the Promotion Site was draft allocated as part of site No. 80 (SHLAA site reference 1140 and part site reference 2241) in the Regulation 18 draft Local Plan: Strategy and Sites published for consultation in July 2014 as being suitable to deliver housing. The draft allocation site being 16 hectares of land to the south of New Pond Road (B3000) and intersected by Furze Lane. The wider site having been assessed by Pegasus Planning on behalf of the Borough Council as not contributing to the purposes of the Green Belt by virtue of its defensible boundaries and being well contained. Site No. 80 was discounted from the Regulation 19 draft Local Plan (June 2016) absent of any fresh technical evidence to justify its omission.
The Promotion Site lies contiguous with the established form of Farncombe which itself lies in the adjoining borough of Waverley.

Waverley borough is also experiencing an acute need for new housing and its own Local Plan has been recently subject to Examination in July 2017 during which the Examination Inspector (Mr Jonathan Bore) has acknowledged that he is minded to recommend that Waverley Borough's annualised housing target is increased significantly from 19 dwellings per annum to around 80 dwelling per annum (the precise amount is to be confirmed). The Waverley Borough Local Plan Inspector also questioned Guildford Borough Council during the Examination on its 'duty to cooperate' role with Waverley Borough Council given the absence of any truly cross boundary strategic housing sites or apparent sharing of housing land supply. In this particular context, Farncombe is a sustainable settlement that benefits from a wide range of services and amenities including a railway station. Land at Pond Farm and Land South of New Pond Road is contained on its boundaries by physical built features including; New Pond Road (B3000) along the entirety of the northern boundary, the Portsmouth to London Waterloo mainline railway (to the eastern boundary) and established residential development (immediately south). The Promotion site itself is formed in two parcels intersected by Furze Lane which connects the village to the busy B3000. Furze Lane itself is well served by a bus services and a bus stop is located just 50 metres south of the Promotion Site entrance.

The Promotion Site is set within the designated Surrey Hills AONB and the Green Belt which covers (washes over) all the land between Farncombe and Guildford. However, in respect of the AONB, two independent landscape appraisals have found that site No. 80 does not contribute to the characteristics and qualities of the wider Surrey Hills AONB and is impacted and influenced by the urban characteristics of the adjoining settlement. Furthermore, the Surrey Hill AONB office in its written comments to planning application reference WA/2014/1330 approved for 80 dwellings (immediately adjacent to the Promotion Site), acknowledged that the area south of the B3000 did not significantly contribute to the characteristic and qualities of the Surrey Hills AONB.

In respect of the Green Belt, it is highly notable that the Borough Council's Green Belt and Countryside Study which is an important evidence based document also indicates that Site No. 80 does not perform strongly when measured against the purposes of including land within the Green Belt.

Nevertheless, the site promoters have commissioned further independent assessment of the site in terms of its visual impact on the landscape, its role as contributing to the purposes of the Green Belt and other technical matters including flooding and flood risk and we can confirm there is no impediment to delivering housing on the Promotion Site.

In term of the housing delivery and subject to the proper planning, design and layout of the Promotion Site we estimate the site can deliver between 90-100 dwellings including affordable housing at full policy rate, whilst still allowing for generous on-site open space and areas that will be kept free to allow for flood risk and established trees to be retained. The additional technical work commissioned by the Site Promoter effectively supports the earlier evidence base work undertaken by the Borough Council which led to the site's draft allocation.

It is also evident that by allocating the promotion site, the Borough Council would be assisting housing need in Guildford Borough but also Waverley Borough which is a central objective of the duty placed on local authorities to cooperate in delivering housing land and meeting the need for housing at a more strategic level.

The promotion site is accessed via Furze Lane in an accessible location on the edge of a large sustainable village which has a wide range of services and facilities including a railway station which provides excellent links to Guildford (6 minutes) and onwards to London Waterloo. The settlement also offers local opportunities for employment and employment creation as part of a sustainable existing settlement. Furze Lane itself is well served by a bus services and a bus stop is located just 50 metres south of the site entrance. In all these respects, Land South of New Pond Road is ideally placed to deliver a sustainable and deliverable residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Duty to Cooperate**

We have already set out our concerns regarding the Council's duty to cooperate in our representation to Proposed Submission Policy S2: Borough Wide Strategy and specifically GBC's approach to re-assessing housing need in isolation from neighbouring borough and districts. In addition, we are mindful that GBC's duty to cooperate was questioned as part of submissions made to the Waverley Borough Local Plan Examination in July 2017. During the Waverley examination, the appointed Inspector (Mr Jonathan Bore) questioned GBC's representatives who were in attendance at the Examination. The Waverley Local Plan Examination Inspector was very keen to understand why Guildford Borough Council does not appear to have identified land or taken on unmet housing need from neighbouring boroughs in its emerging Local Plan. GBC's response at the Waverley Local Plan Examination was, in effect, to say that Guildford borough was highly constrained and the ability therefore to take unmet housing need from neighbouring authorities was not possible. This approach, should it be carried forward into the Guildford Local Plan Examination, is simply not adequate.

Firstly, all local authorities forming part of the West Surrey SHMA (and several authorities beyond this area) have constraints whether those constraints include metropolitan Green Belt, AONB, AGLV, Thames Basin Heaths SPA etc. The fact remains that GBC has not only failed to take account of neighbouring unmet need, it has actively and significantly:

- Reduced its Objectively Assessed Need (OAN) against the current of acute housing
- Reduced its proposed housing land supply despite historic and current under-performance of housing delivery, and;
- Discounted smaller housing sites which are well placed to meet the needs of neighbouring authorities and communities, despite weighting the reduced housing delivery to the back end of the Plan

We strongly maintain that the settlement of Farncombe (with its shared boundary with GBC) represents a suitable, sustainable and accessible opportunity to help accommodate the unmet housing needs of both authorities in just the way that the duty to cooperate is designed to facilitate. Land South of New Pond Road (site No. 80) is ideally placed to assist Guildford Borough Council meet its housing land supply target whilst also helping to meet the acute needs of communities that share a border with Waverley borough in a geographic area which is well served by a range of existing services and amenities including a railway station which links Farncombe to Guildford (just 6 minutes travel time) and which is served by established bus routes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Requested Modifications

In all of the above respects, Land at Pond Farm and Land South of New Pond Road is ideally placed to deliver a sustainable high quality residential development including affordable housing during the front end of the Plan period. The PSLP should therefore be modified by allocating Site 80 for housing development and included the Promotion Site in the PSLP Part 2: Sites, and identified in Appendix F: Policies Map accordingly.

The PSLP seeks to deliver low and unambitious Annual Housing Target figures which will not meet the acute need for housing in the borough or meet the needs of neighbouring authorities or respond to inward migration from London. The OAN should be increased accordingly to at least 693 dwellings per annum and Policy S2 modified accordingly.

The PSLP’s Housing Strategy which weighs housing delivery to the back end of the Plan period (form 2026 onwards) will exacerbate housing need, lead to increased house prices and unaffordability, and lead to further increasing in housing waiting. The annualised Housing Delivery targets should be increased at the front end of the Plan period through the allocation of additional sites that are able to be delivered in the first five years of the Plan period. The Annual Housing Target Table contained in Policy S2 should be modified accordingly.

Land at Pond Farm and Land South of New Pond Road was identified in Volume V Section 17 of the Green Belt and Countryside Study (prepared in 2014). The Promotion Site was identified as area F6 which was then further divided into F6A and F6B. In the summary, the Report identified the range of significant defensible boundaries surrounding the wider site and concluded that site F6 B, ‘‘…provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt’. Additional technical assessments both conclude site No. 80 does not contribute to the purposes of including land within the Green Belt. Site No. 80 should be removed from the Green Belt and the Green Belt boundary modified and identified accordingly in Appendix F: Policies Map.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Requested Modifications

In all of the above respects, Land at Pond Farm and Land South of New Pond Road is ideally placed to deliver a sustainable high quality residential development including affordable housing during the front end of the Plan period. The PSLP should therefore be modified by allocating Site 80 for housing development and included the Promotion Site in the PSLP Part 2: Sites, and identified in Appendix F: Policies Map accordingly.

The PSLP seeks to deliver low and unambitious Annual Housing Target figures which will not meet the acute need for housing in the borough or meet the needs of neighbouring authorities or respond to inward migration from London. The OAN should be increased accordingly to at least 693 dwellings per annum and Policy S2 modified accordingly.

The PSLP’s Housing Strategy which weighs housing delivery to the back end of the Plan period (form 2026 onwards) will exacerbate housing need, lead to increased house prices and unaffordability, and lead to further increasing in housing waiting. The annualised Housing Delivery targets should be increased at the front end of the Plan period through the allocation of additional sites that are able to be delivered in the first five years of the Plan period. The Annual Housing Target Table contained in Policy S2 should be modified accordingly.

Land at Pond Farm and Land South of New Pond Road was identified in Volume V Section 17 of the Green Belt and Countryside Study (prepared in 2014). The Promotion Site was identified as area F6 which was then further divided into
F6A and FGB. In the summary, the Report identified the range of significant defensible boundaries surrounding the wider site and concluded that site F6 B, ‘..provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt’. Additional technical assessments both conclude site No. 80 does not contribute to the purposes of including land within the Green Belt. Site No. 80 should be removed from the Green Belt and the Green Belt boundary modified and identified accordingly in Appendix F: Policies Map.

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/791</th>
<th>Respondent:</th>
<th>17304353 / Emma Shaw</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>()</td>
<td>is Sound?</td>
<td>()</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I strongly object to the evidence behind the projections used to assess housing need. The question concerning the evidence underpinning the Proposed Submission Local Plan provided by The Strategic Housing Market Assessment, should not be – ‘is it adequate, up to date and relevant’, but simply - is it a valid method of analysis? It is clear from the conclusions of the NMSS report (commissioned by GRA, EGRA) that the ‘objectively assessed housing need’ calculation is deeply flawed and invalid. Since this flawed analysis significantly overestimates the yearly housing need figure, the current housing market assessment must be adjusted in the light of this finding.

I fully support the conclusions and suggestions made by GRA in their report, particularly those concerning provision of housing for students. Students have very different, specific housing requirements from the general population which should be catered for by specialist providers, primarily the University of Surrey itself. Leaving the greater part of this provision to the open market causes considerable problems, as evidenced by issues in Oxford, which resulted in the need for licensing of all HMO rental properties across the city, just to ensure basic quality and safety.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2351</th>
<th>Respondent:</th>
<th>17304449 / Steve Wright</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>()</td>
<td>is Sound?</td>
<td>()</td>
<td>is Legally Compliant?</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I wish to officially log that I object to Policy A26 and the inclusion of Blackwell Farm and surrounding green belt land as a development site [Policy A26 & para. 4.1.9]

1) Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]. This has been ignored by the council and the local plan.

2) Directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas. This additional office space is not required and will add additional unnecessary burden on local housing needs.

3) Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]. Traffic is already a major problem in Guilford and this development will make travel down the A3 and Hogs Back and surrounding areas unbearable.

4) Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2373   Respondent: 17304865 / A Cruse   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I strongly object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2372   Respondent: 17304865 / A Cruse   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **I strongly object to removal of Brownfield sites (A4) from the Plan**

Site A4 in Guildford has been removed. Why? This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2371</th>
<th>Respondent:</th>
<th>17304865 / A Cruse</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I strongly object to the extended development in the Green Belt (Policy P2, Site A43)

I object to further extensions to Garlick’s Arch (A43) and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2374</th>
<th>Respondent:</th>
<th>17304865 / A Cruse</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I strongly object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

**I object to the unfair imbalance of the Plan across the borough.**

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within
3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

- The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”
- The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

I strongly object to removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

I strongly object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5: "We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECTION TO "THE GUILDFORD PLAN -JUNE 2016"

I have lived in East Surrey since 1967 and over the years have sadly witnessed the gradual erosion of the rural aspects of the area despite living in the "Green Belt" as seems to be the case in most rural areas in Surrey over the years.

Whilst I am sure the majority of people living in Surrey and farther afield readily accept that there is a need for more housing (particularly affordable housing for the younger generation and key workers) any Plan has to be based on sensible and sustainable numbers.

As a very frequent visitor to see my son, daughter-in-law and grandson who live in West Horsley, I am shocked at seeing the proposals for future housing in the West and East Horsley Parishes contained in "The Guildford Plan - 2016". The effect of a 35% increase on the number of current homes in the area will be profound, particularly with as I understand it little or no explanation as to how the existing infrastructure and services generally will cope with such a huge explosion of building.

Based on my comments above I object most strongly to the proposals set out in "The Guildford Plan" and urge Guildford Borough Council to have a serious rethink about the sizes/numbers of developments proposed and table a much more realistic revised Plan in line with the wishes of electorate of Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/285</th>
<th>Respondent: 17307457 / Eileen Stone</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am writing as a concerned parent of a West Horsley resident regarding the latest changes made to the Guildford Borough Proposed Submission Local Plan June 2017 consultation, having expressed my concerns previously.

It would seem that no change is being proposed to the idea of insetting West and East Horsley from the Green Belt which will risk the outstanding countryside surrounding the two Parishes being overwhelmed by the Metropolitan Sprawl. Although there is a reduction in the number of new homes being proposed for West Horsley there is no evidence of an overall reduction in the number of new homes but clear evidence of an imbalance between the number of new homes being proposed for the Eastern side of the Borough compared with the Western side.

Hopefully the final submission will include realistic infrastructure upgrades in line with the proposed housing developments. Finally, in my view the proposed Wisley Airfield redevelopment would be a disaster for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/287</th>
<th>Respondent: 17307457 / Eileen Stone</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I am writing as a concerned parent of a West Horsley resident regarding the latest changes made to the Guildford Borough Proposed Submission Local Plan June 2017 consultation, having expressed my concerns previously.

It would seem that no change is being proposed to the idea of insetting West and East Horsley from the Green Belt which will risk the outstanding countryside surrounding the two Parishes being overwhelmed by the Metropolitan Sprawl. Although there is a reduction in the number of new homes being proposed for West Horsley there is no evidence of an overall reduction in the number of new homes but clear evidence of an imbalance between the number of new homes being proposed for the Eastern side of the Borough compared with the Western side. Hopefully the final submission will include realistic infrastructure upgrades in line with the proposed housing developments. Finally, in my view the proposed Wisley Airfield redevelopment would be a disaster for the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2381  Respondent: 17307649 / Rick Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

I object to the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9] because it:

1. disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
2. directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
3. ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
4. adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/291  Respondent: 17307937 / Eufi Atkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley
As a resident of East Horsley I write, **YET AGAIN**, to **OBJECT** most strongly to the Proposed Guildford Local Plan 2017.

The 2016 Local Plan had some serious effects on our village:

- The extension of the settlement boundaries of the Horsleys into the Green Belt
- The removal of the extended village areas from the Green Belt
- The proposal to develop **SIX (!) large housing sites and several smaller sites in the extended settlement area**

The changes in the Guildford Local Plan 2017 are minimal, **FOUR of the original development sites remain**, including the proposal for 2,000+ houses, plus sheltered/care homes, Gypsy/Traveller pitches (!!), employment/retail space and two schools on the former Wisley Airfield.

**Wow, is that a town or a city?!**

There were, I understand, over 30,000 objections to the 2016 Local Plan which identified a clear desire to limit expansion into the Green Belt. I see no evidence in the Guildford Local Plan 2017 that this plea has been heeded.

Why do we have to, yet again, write to express our objections the proposed developments? This process is clearly designed to wear the local residents down until the plans get implemented. 30,000 objections last year, but yet again, here we are having to comment on a Local Plan that keeps being thrust down our throats.

**Scale of the Proposed Developments:**

The developments will further aggravate the already overstretched infrastructure of both East and West Horsley. The road through East Horsley (Ockham Road North & South) is inadequate even now, and cannot be upgraded. Normal cars have to slow down just to pass each other in certain parts, and climb onto the pavement when a truck passes through.

And you want to add further traffic to the area?!

The development plans for 2,000+ new dwellings plus considerable related infrastructure on the Wisley Airfield, is only two miles from East Horsley. I am of the opinion that the Horsley area will not be able to absorb the increased population, traffic and pollution.

It is not realistic to assume that the new town will restrict itself to the Wisley Airfield area. Their daily routine will spill into the surrounding areas including East Horsley. We do not have sufficient facilities, schools, surgeries and other services. Gas, electricity and telephone services in the area are already operating at full capacity on very old pipes, wires and exchanges. Local roads are too narrow and winding to take the existing traffic, and there is insufficient parking anywhere, even in front of most homes. The local roads were built in the 1930s or before, and are mostly no more than narrow lanes where cars have to slow down to pass each other. The access roads to East Horsley are narrow and winding and are not sufficient to handle even today’s traffic.

The scale of the proposed Wisley Airfield development is way out of proportion and way out of character to the existing infrastructure and the space available in this small, picturesque old village. The new town will completely destroy the special character of our historic village.

**Station Parade a “District Centre”??**

There is a clear misunderstanding of the nature of the facilities in our village centre, it would be completely inappropriate to target the area for future urban development. Please, get out of your offices and come and see the village in action on
any normal week day and week end, see how the facilities, roads, drainage etc are already overstretched. As a certain tennis player often said: You cannot be serious with these proposals!

Green Belt:

The Green Belt is a policy for controlling urban growth. The idea was developed so as to have a ring of countryside where urbanisation would be resisted, maintaining an area where agriculture, forestry and outdoor leisure could be expected to prevail. The fundamental aim of a Green Belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of Green Belts is their openness.

The Metropolitan Green Belt around London was first proposed by the Greater London Regional Planning Committee in 1935. The Town and Country Planning Act 1947 then allowed local authorities to include Green Belt proposals in their development plans. In 1955, the then Minister of Housing Duncan Sandys encouraged local authorities around the country to consider protecting land around their towns and cities by the formal designation of clearly defined Green Belts, to prevent urban sprawl.

The 2012 National Planning Policy Framework (NPPF) issued by the Government clearly sets out the following purposes (amongst others) for including land with the Green Belt:

- To check the unrestricted sprawl of large built-up areas
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

How do you reconcile the Wisley Airfield proposal, and the removal of the Horsleys from the Green Belt, with the NPPF’s guidelines above?

It appears that you now want to ignore the very reason for having designated Green Belts around urban areas, and specifically around my village of East Horsley. I strongly **OBJECT** to your proposals.

**Objection:**

I know that I am not the only person writing, yet again, to **OBJECT** to the Guildford Local Plan 2017. I hope that the GBC, as our elected representatives charged with representing our interests, will **LISTEN TO THE COMMUNITY**.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/293</th>
<th>Respondent: 17308385 / Anne Nicholls Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley South</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 - Land at Garlick’s Arch, Send Marsh I object to Policy A58 - Land at Burnt Common, London Road I object to Policy 2 at paragraph 4.3.15

My objections to these proposals are based on the ignorance of a local council to ignore hundreds of previous objections made by local people who already live, work and contribute to the community.

The traffic congestion is getting worse and the impact of the above developments on the local main roads and country lanes will lead to grid lock through Send and Ripley; disruption to the A3 and other local A roads.

The inclusion of a requirement for ‘travelling show people plots’ in this location; this sounds like an opportunity to recognise and publicise diversity rather than a proven requirement. Where are these people now and why do they need a new/other site?

Previously the Burnt Common site was deleted from the 2014 plan because of all the objections made - the populace was listened to so why has this been reintroduced as a new allocation - did the council think we would not notice; had changed our minds or don’t care?

Why are new industrial and warehouse developments in the middle of the green belt being proposed when Slyfield and Guildford have empty sites and industrial units - sounds like poor planning and project management?

Thank you for affording me this opportunity to object and I hope you take the concerns raised seriously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/294  Respondent: 17308417 / Shirley Bowerman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the proposal to inset Send Business Park from the Green Belt.

I object because this is effectively an old non-conforming user in an area of outstanding countryside next to the tranquil and pleasing River Wey Navigation. It is a sore thumb in an area of natural beauty.

I object because of the very restrictive road access for traffic from both ends of Tannery Lane.

I object because expansion or development of this area detracts from the rural nature of the Green Belt and is totally inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2408  Respondent: 17308417 / Shirley Bowerman  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object because the previous plan to build 45 houses on the site was bad enough. The extra 15 houses now proposed will exacerbate the problems and shows contempt to the hundreds of Council taxpayers who previously objected to the 45 houses then proposed. No evidence has been produced to show that any houses are required here, especially for the extra number now proposed.

I object because access and traffic problems will be very much worse in Tannery Lane at the junction with the A247 in Send Road and totally disastrous at the Newark Lane junction. Tannery Lane for most of its length is winding and barely wide enough for one vehicle. There is no footpath and houses abut directly onto the road.

I object because the proposal will worsen erosion of the Green Belt in Send.

I object because surface water is already a serious problem and this proposal will make it very much worse.

I object because the proposal will detract from countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2411 Respondent: 17308417 / Shirley Bowerman Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object because the proposal ignores all the thousands of objections made by local people and makes things much worse by including even more houses, which looks like a punishment of local people having the temerity to object.

I object because there is no proven demand for travelling show-people in this location.

I object because this site is beautiful Green Belt land and there are no exceptional circumstances to merit removing this protection.

I object because it is grossly excessive development of our village and the number of houses proposed is overwhelmingly too many.

I object because this is a site of wonderful ancient woodland that dates back to medieval times.

I object because this proposal will connect Ripley and Send and defeat the key purpose of the Belt.

I object because the site often floods and is currently a Flood Zone 2 allocation.
I object because the site is contaminated with lead shot which has been accumulating for 50 years.

I object because the enormous amount of traffic which will be generated by this proposal will catastrophically clog up the roads of both Send and Ripley, many of which can barely take two lines of traffic. It will also make the clogging up of the nearby Guildford By-pass disastrously worse. One wonders whether the proposers of this policy ever use the by-pass, particularly travelling south, when bottle-necking can extend right to Burpham even on an ordinary weekday.

I object because potential objectors have never been shown the figures on which the proposed number of additional houses is based and which can only be of benefit to those who stand to profit from such proposals. Justice must not only be done but must be visibly and manifestly be seen to be.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

I object to this proposal as it was deleted from the 2014 draft because of the number of objections previously lodged and nothing relevant his since happened.

I object because the word ‘maximum’ for industrial use (which was more than enough already) has unbelievably been altered to ‘minimum’ which means that there would be an obligatory 7000 square feet of building on the site and no top limit to the industrial buildings allowed in the new plan. This cannot be right when there has been a decline in the demand for industrial land.

I object because this site was deleted from the 2014 draft as a result of all the objections. It cannot now be right that it has now been reinstated greatly enlarged. Something very sinister must be going on for this to be done.

I object because there is absolutely no need to build industrial or warehouse buildings in the middle of the Green Belt when Slyfield and Guildford have empty sites and industrial units. One wonders what is going on.

I object because the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole Borough, not a huge over-allocation of 10 hectares at Send in the Green Belt. Again, it appears that a huge unnecessary project is being proposed to destroy this beautiful part of the Green Belt, to nobody’s benefit but those with an interest in development.

I object to this proposal because it will lead to gridlock both on small local roads and on the Guildford By-pass.

I object to this proposal because it will join up existing villages and defeat the purpose of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Employment

MVDC’s Functional Economic Market Area assessment identifies commuting linkages between Guildford Borough and Mole Valley, with reasonable connectivity between the two authorities by both car and train (particularly from the Leatherhead and Dorking areas). The amendments which clarify the location and amount of strategic employment allocations are welcomed as it would offer wider employment opportunities which may be of benefit to residents of Mole Valley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Rural Economy

The amendments to the rural economy policies to support small incubator units, loss of shops and services are welcomed given the similarities between the rural areas and villages of our adjacent authority areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Transport

The amendments to the sustainable transport section seeking to mitigate the transport impacts of new development are supported as Guildford Borough is within commuting distance of MVDC by both car and train.

MVDC still consider that the Proposed Plan is sound and recognise the ongoing and previous Duty to Cooperate working that has taken place between our two Councils in the production of the Guildford Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Green Infrastructure

The amendments to the supporting text which clarifies that Natural England has agreed to review the AONB Boundary and that the work is included in the current work programme are supported. MVDC notes the policy name change and that the AGLV will be retained until such time as there has been a review of the AONB boundary. Please note that MVDC is committed to and would wish to be involved in this cross boundary green infrastructure review.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We act for Crimson Project Management Limited. This representation relates to the proposed allocation of land at BLACKWELL FARM- POLICY A46 & PARA 4.1.9. The draft Policy A46 proposed to allocate the above site for a residentially led mixed use development including a new primary school, secondary school and other development. Our clients object to this proposed allocation on the basis that there are more sustainable options available for the provision of additional housing and education facilities through a sustainable urban extension to Fairlands where there is an established existing community with local retail and community facilities already in existence and where an extension to the village would help sustain and enhance these facilities. It seems clear that the Blackwell Farm proposal has attracted significant objection on the grounds of highway and traffic impacts of the development on the local highway network. It should be noted that there are no highway objections to the provision of a new education facility at the Rokers Farm site at Fairlands. The Blackwell Farm allocation would also have demonstrably harmful landscape impacts on land which, as the draft policy itself recognises, is variously within an Area of Outstanding Natural Beauty and an Area of Great Landscape Value. Whilst situated in the Green Belt, the Rokers site in Fairlands would not result in the same impacts on national landscape designations, nor any other planning considerations that cannot be appropriately mitigated.

In the circumstances, the proposed submission draft Local Plan should be further amended to include an allocation at the Rakers site, Holly Lane, Guildford for a mixed use development including an education facility, housing, community and other facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5219  Respondent: 17308737 / Crimson Project Management Limited  Agent: (ROBINSON ESCOTT PLANNING LLP) John Escott

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Consultation Draft Guildford Borough Local Plan July 2014 identified a need for a new five form entry secondary school to the north or west of Guildford. A site for the school was proposed to be allocated at Salt Box Road, Guildford. The Regulation 19 submission Draft Local Plan 2016 deleted this proposed allocation.

Instead, a seven form secondary school was proposed to be allocated at a strategic mixed use site at Normandy/Flexford. The revised submission Draft Local Plan 2017 now deletes the Normandy/Flexford allocation and proposes both a new primary school and secondary school on land at Blackwell Farm.

This is now the third site that the Council has proposed for the school. It is acknowledged in the justification for the Blackwell Farm allocation (A26) that the access road to the proposed allocation would have adverse impacts on the AONB and the AGLV which will need to be minimised. It is also accepted that there will be an impact on the A31/A3 junction in advance of delivery of the Highway England A3 Guildford scheme and finally that interventions will also be required to address the potential highway performance issues which would result from the development. Crimson Project Management has recently been refused planning permission for a mixed use development which would include a new educational facility as part of a sustainable urban extension to Fairlands. There were no highway objections to the projection nor any other landscape, ecology or other planning objections that could not be appropriately mitigated.

Neither the school nor any other part of the development would have resulted in adverse impacts on any adjoining neighbour. The development is deliverable now and Guildford Education Partnership would be the delivery partner for the new school. This places the Rokers site in a better position to deliver the required educational infrastructure than any of the
sites thus far proposed by the Council. In the circumstances, the Infrastructure Schedule contained at Appendix C should be amended to include provision of a new education facility as either a two form entry primary school with room for expansion of a five form entry secondary school on the Rokers site at Fairlands as part of a new mixed use development to include housing, community uses and sporting facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/840  Respondent: 17308737 / Crimson Project Management Limited  Agent: (ROBINSON ESCOTT PLANNING LLP) John Escott

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our clients object to Policy S2 and to the accompanying Table 1 on the grounds that the proposed spatial strategy and the proposed allocations in respect of the provision of housing and education facilities are inconsistent with the overarching strategic objective of delivering sustainable development and the presumption in favour of sustainable development that is set out at Policy S 1.

In particular, the draft plan is deficient in not allocating a sustainable urban extension to Fairlands for a mixed use development comprising a new educational facility, housing, community and other local facilities whilst allocating sites for such uses which are demonstrably less sustainable. Table 1 should be amended to include the sustainable extension to Fairlands as a village extension that will deliver up to 400 new homes within the next five years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/868  Respondent: 17309793 / Shere Parish Council (Suzanne Hoyland)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The council considers that the new version of the policy P1 Surrey Hills Area of Outstanding Natural Beauty gives less protection to the AONB than the text previously proposed. They believe that the text:

"will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they:"
• conserve and/or enhance the setting and views of the AONB
• conserve wildlife, historic objects or natural phenomena within it
• promote its enjoyment by the community and visitors to the area
• support the rural economy of the Surrey Hills area
• provide or maintain public access to the AONB.”

should not be changed to the proposed text:

“will be conserved and enhanced to maximise its special landscape qualities and scenic beauty.

(2) In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest.

(3) High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.”

[It is recognised that paragraph (2) relates to the subsequent part of the policy and not to the text noted above that is proposed to be removed.]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The council considers that the new version of the policy P1 Surrey Hills Area of Outstanding Natural Beauty gives less protection to the AONB than the text previously proposed. They believe that the text:

“will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they:
• conserve and/or enhance the setting and views of the AONB
• conserve wildlife, historic objects or natural phenomena within it
• promote its enjoyment by the community and visitors to the area
• support the rural economy of the Surrey Hills area
• provide or maintain public access to the AONB.”
should not be changed to the proposed text:

“will be conserved and enhanced to maximise its special landscape qualities and scenic beauty.

(2) In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest.

(3) High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.”

[It is recognised that paragraph (2) relates to the subsequent part of the policy and not to the text noted above that is proposed to be removed.]

Attached documents:
Policy A26 (Blackwell Farm)
I am writing to object in the strongest terms to the above policy in the Guildford Local Plan.
I have had a home on the Hog's Back since 1936 and the enormous increase in traffic along what used to be a single-lane country road, before it was dualled, is hard to believe.

The suggestion that 1,800 new homes should be built at Blackwell Farm with access on to the A31 Hog's Back at a signalised junction and roundabout at the top of the Farnham Road is ludicrous. This stretch of the A31 westbound before it joins the A3 northbound is notorious for traffic jams and queues, not only during peak hours but throughout the day, sometimes for no reason other than volume of traffic but exacerbated by the slightest incident occurring on the A3 or in Guildford town. The pollution caused by this increased traffic will worsen the already high levels of Nitrogen Dioxide, well above the EU legal limit, which have recently been recorded at the A3 end of Compton village.

In order to have more housing available, Surrey University could free up the housing in and around the town, presently occupied by students, by building on their land at Manor Park which they removed from the Green Belt many years ago and since then have failed to meet their obligations as part of that development.

Further damage by the University to this nationally important countryside should be prevented at all costs while other options are available to them, particularly by fulfilling their existing obligations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

**Site A42 Tannery Lane, Send**

The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane will have a significant impact on the already highly congested local rural road network around and within Ripley. The access from Tannery Lane onto Newark Lane is a single track road, with passing spaces, extra traffic on this road will invariably lead to additional congestion and high possibility of accidents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2496</th>
<th>Respondent:</th>
<th>17316033 / Anne Morris</th>
<th>Agent:</th>
</tr>
</thead>
</table>

### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

**Housing at Site A43 Garlicks Arch would be on greenbelt land. The potential increase in the proposed 400 dwellings to 650, would be extremely harmful to the rural nature of the surrounding villages. The inclusion of 6 x travelling show people plots with associated storage facilities is entirely inappropriate in a rural environment within the greenbelt and there is no identified need within the Local Plan documentation. The allocation of 6 travelling show people plots is the designated formula for 1500-1999 homes on the same site according to the 2017 local plan and so it is out of scale with the proposed development. The potential for a substantial increase in industrial floorspace from 7000sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document. The potential for a waste management facility at site A58 Burnt Common is briefly mentioned and does not allow for full and proper consultation.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: | pslp172/2504 | Respondent: | 17316257 / Neeley Jackson | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2503  Respondent: 17316257 / Neeley Jackson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable. It is nonsensical to not use a space that is already allocated as brownfield at the expense of greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2499  Respondent: 17316257 / Neeley Jackson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlick’s Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

As explained having only just moved into the area, I was not aware of the congestion on Send Barnes Lane. I have quickly come to realise this road is used as a main cut through to get to the A3 to Woking and vice versa. Only this morning I found myself having to queue for some time to get out of my own road. This will only be compounded with the amount of vehicles using the road should the large amount of additional housing be created.

My children go to the local school and in the two weeks they have been there I have been shocked at both the speed and size of vehicles using the road. Having already moved away from an area due to health concerns it causes me great anxiety to think this could happen again. I have seen one of the parents taking matters into her own hands and wearing a hi viz jacket and waving a 30mph sign at drivers, such is the concern of such a busy road which will only get worse if the vast amount of houses are built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2502  Respondent: 17316257 / Neeley Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The inclusion of site A58 Burnt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”

2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.
Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2501</th>
<th>Respondent: 17316257 / Neeley Jackson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2500</th>
<th>Respondent: 17316257 / Neeley Jackson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A50</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan is self-inconsistent in respect of traveller sites.

A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2505  Respondent: 17316257 / Neeley Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

This is of huge concern to me as a new local resident. Not only from a health perspective but yet again for the congestion this will add to the surrounding area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/918  Respondent: 17316257 / Neeley Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost (i.e. a reason for not delivering affordable houses). That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

This is beyond insulting. If affordable housing is not to be provided on the sites allocated by the council then what is the point, where will these houses be built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: pslp171/920</th>
<th>Respondent: 17316257 / Neeley Jackson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the lack of proper infrastructure planning for sites (A43 and A42)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Foreword to the plan by Paul Spooner includes on page 5:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>&quot;We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure which is a key theme of our Local Plan&quot;.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Attached documents: |

---

<table>
<thead>
<tr>
<th>Comment ID: pslp171/919</th>
<th>Respondent: 17316257 / Neeley Jackson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object removing Send Business Park from the Green Belt (4.3.15).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Comment ID: pslp171/938  Respondent: 17318657 / Stephen Sage  Agent:
#### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

My comments are as follows:

1. **SUMMARY** It appears that Guildford’s proposal for more than 12000 new homes is excessive and based on flawed evidence. The proposal would lead to unnecessary loss of green belt, damage to Guildford’s character and further increases to the already high level of traffic congestion in our gap town.
2. **POPULATION** There is evidence that population growth has been greatly overestimated because students who leave have not been recorded.
3. **QUALITY OF LIFE** If the council does not control expansion the 2017 plan will harm the qualities that contribute to the economy of Guildford.
4. **LAND ALLOCATION** So much land is allocated for development in the 2017 plan that Guildford may have to provide homes for Woking.
5. **CONGESTION** The proposals in the plan will exacerbate the congestion problems that are already very bad.

I hope you will consider my comments and amend the plan accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: pslp17q/131  Respondent: 17319297 / Surrey Hampshire Borders CAMRA (Michael Bell)  Agent:
#### Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**Attached documents:**
Please find a response document attached.

[text of attachment reproduced below]

I am writing on behalf of the Surrey/Hants Borders Branch of CAMRA, the Campaign for Real Ale, in relation to the above consultation.

You will recall that I submitted comments on policies E5, E8 and E9 in response to last years consultation exercise. I do not consider these comments and suggestions to have been addressed in the latest version of the Plan and I therefore understand that these will be passed onto the Inspector for consideration.

I would however also like to pass comment on the changes you are proposing with respect to Policy E5 and Policy E9. Both Policy E5 and E9 have been amended to provide additional protection against the loss of shops and services and I would ask that consideration is given to extending this change to also include public houses (ie, Class A4) Pubs are essential to the well being and community cohesion in both rural and urban areas, where facilities are scarce and transport links typically poor. Whole communities often have a single pub to act as the focus of the community it is essential that they are retained where viable and giving this additional level of protection would help in this regard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Guildford Local Plan Changes Consultation response July 2017.doc](18 KB)

---

Comment ID: pslp172/2648  Respondent: 17320801 / Terence O'Rourke Ltd for M&G Real Estate (Andrew Elliott)
Agent: Terence O'Rourke for M&G Real Estate (Andrew Elliott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

See attached document for full comments. The main response is as follows:

M&G strongly supports changes to the policy to confirm an increase in the allocated number of homes and increased A3 food and drink and A4 drinking establishment floorspace within the site. It is considered that these changes are soundly based taking into account the location and capacity of the site, and the latest evidence of need for new homes and leisure provision in the town centre. They reflect current and longer-term trends in the changing mix of successful town centre uses. M&G supports the flexible wording of these policy provisions in that no minimum floorspace or unit provision is required.

Whilst not objecting to the 400 home limit in principle, it is suggested that this be worded with allowance for flexibility in the event that small increases in the total number of homes are proposed. It is recommended that the wording be adjusted to say up to “approximately” 400 homes, or “about” 400 to avoid policy conflict in the circumstance where, say, a 410 unit scheme comes forward and other relevant policy requirements for the site are met.

There are a number of other new changes to Policy A6 that present significant concern to M&G from a planning and project delivery perspective. M&G objects to the following changes, which are not soundly based.

i. The expression of the allocated comparison retail floorspace provision as a minimum.
This change reduces the flexibility of the policy approach and could, potentially, threaten the deliverability of a project given market changes over the plan period or changes in other key commercial parameters including whether or not an anchor tenant is secured. Notably, land assembly is required to deliver the full site allocation project. In the event that full land assembly is not achieved the ability to meet a policy compliant minimum retail floorspace within a residual land area would be challenging.

Whilst it is recognised that the 2017 retail and leisure study addendum suggests that up to date forecast comparison retail growth requirements are less than predicted by the previous study, the report is strongly caveated that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution. In practice comparison retail need forecasts could increase or reduce during both the plan period and beyond for a variety of economic reasons and therefore a flexible policy approach is necessary to reflect this. M&G requests that the comparison retail floorspace allocation for the site is expressed as an approximate figure (with 45,000 sq m gross as previously included in the policy being reflective of M&G’s current draft redevelopment proposals).

It is recognised that proposals for this long-term project will need to be accompanied by a retail impact assessment to justify the proposed floorspace quantum in the context both of other existing provision in the town and of Guildford’s position as a centre competing with other town centres sub-regionally. This offers another check to demonstrate that the quantum of floorspace coming forward in a scheme is appropriate.

National Planning Policy Framework (NPPF) para 14 states that local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. Paragraph 21 requires policies to be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. NPPF paragraph 157 further identifies that it is crucial for plans to promote the flexible use of land. Accordingly it is an unsound approach for the plan to apply a strict minimum floorspace quantum requirement in the policy.

ii. The specific policy requirement for provision of one gym (D2) use

The Guildford Retail and Leisure Study Addendum, February 2017 considers forecast need for new commercial leisure provision, focusing on cinema, food and beverage, and fitness and leisure provision. Opportunities for additional cinema screens (new/expanded cinema facility in Guildford town centre) is identified together with the potential need for two branded gym facilities, again with demand likely to be focused on Guildford town centre.

M&G supports the provision of one or more D2 assembly and leisure uses as part of a successful mixed use North Street redevelopment, but considers that policy should be worded more flexibly to encourage D2 uses (such as a gym provision) that broaden the offer of the town centre, rather than policy being prescriptive about a specific D2 use for the site. As currently drafted the policy requirement is inflexible, potentially stifling opportunities for alternative or innovative complementary commercial leisure provision that can support a successful scheme for Guildford.

iii. Unnecessary design requirements

Items (2) and (5) of Policy A6 are unnecessary, involving substantial overlap and duplication with the content of Policy D4 character and design of new development.

Whilst M&G does not object per se with the requirements of (2) and (5) relating to site context, street pattern, heritage and views, the content of (3) on scale of development should be removed. An appropriate scale and mix of development can be considered through pre-application discussions, environmental impact assessment, proposed mitigation measures, and the determination of a planning application. Policy requirement (3) is clumsily worded and unworkable, and fails to recognise the role of viability in determining a deliverable mix of uses or the need for flexibility in a period of changing market conditions and retail trends.

Other comments on Policy A6

The use of floorspace figures in the policy needs clarification.

It is recommended that all retail/commercial floorspace figures are expressed in the policy as square metres on a Gross Internal Floor Area (GIFA) basis as defined by the Royal Institution of Chartered Surveyors. M&G has used this form of measurement for the purposes of its draft North Street development scheme.
To improve the policy and for the purposes of soundness we recommend the following varied wording for the policy as a whole. Note that this includes a suggested small tweak to the flood risk wording to comply with national guidance:

**POLICY A6: North Street redevelopment, Guildford**

**Allocation**

The site is allocated for a comprehensive mixed use redevelopment with:

- Approximately 45,000 sqm (gross internal) additional comparison retail floorspace
- Approximately 6,000 sqm (gross internal) additional food and drink (A3) and drinking establishments (A4)
- 400 homes (approx.) (C3)
- Provision of (D2) assembly and leisure use floorspace, such as a gym

**Requirements**

**Office provision**

(1) A minimum of 5,500 sq m (gross) of existing office (B1a) floorspace will be retained.

**Design, vitality and connectivity**

(2) Development to comply with Policy D4 on the character and design of new development, responding to the context set by the surrounding street pattern and historic environment, including the adjacent Conservation Area. Particular care to be given to massing, heights, views in and out of the site, and roofscapes.

(3) Design to enhance and respond to the existing historic shopping core and;

- Improve connectivity with High Street and lanes, and
- Improve underused areas, and
- Improve the public realm

(4) Mix day and night time uses to add to vitality of area

(5) 24 hour access to public streets and squares

**Bus interchange**

(6) Bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located partly or wholly off site

(7) On-street provision of bus stops and waiting facilities within the town centre will be designed to facilitate interchange between bus services and to be integrated with other town centre activities.

**Transport**

(8) Stopping up of Commercial Road and Woodbridge Road (between North Street and Leapale Road) and Traffic Regulation Orders affecting the roads surrounding the development will be necessary including changes to Leapale Road, Onslow Street and North Street to create more pedestrian space and to facilitate the movement of buses.
(9) The development will be designed to maximise opportunities for sustainable transport given its central location that promotes walking, cycling, bus and train use. By integrating transport with car parking provision, the number of car journeys will be minimised in favour of sustainable modes.

Flood risk

(10) Achieve flood risk betterment, appropriate mitigation and flood risk management, and have regard to the recommendations of the Level 2 SFRA

(11) Avoid development of ‘highly vulnerable’ or ‘more vulnerable’ uses in flood zone 2 (medium probability of river flooding) and flood zone 3 (high probability)

Assessments

(12) To be determined at planning application stage, but including;

(a) Retail impact assessment

(b) Environmental impact assessment (EIA)

Opportunities

(1) This site offers a major opportunity to reinforce Guildford’s comparison retail offer, provide town centre housing, improve the leisure offer of the town centre, to create new squares and streets, and to improve the appearance of North Street

(2) Help to reduce flood risk in the local area

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See attached document which includes proposed updated wording for the policy.

Attached documents: 170721 M&G reps Guildford Local Plan 2017.pdf (252 KB)
The policy confirms that use class A1, A2, A3 and A4 development in Guildford town centre will not be subject to a carbon reduction requirement, however the requirement applies to new town centre apartments.

Paragraph 4.5.30 states that new buildings “except retail developments in Guildford Town Centre” must achieve a reasonable reduction in carbon emissions.

Clarification is required on whether the new homes element of retail-led mixed-use development on North Street will be subject to the policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/1082  **Respondent:** 17320801 / Terence O'Rourke Ltd for M&G Real Estate (Andrew Elliott)  
**Agent:** Terence O'Rourke for M&G Real Estate (Andrew Elliott)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

M&G welcomes this new design policy that will apply to all new development, notably the encouragement given to innovative architecture in the appropriate context, and use of appropriate density to make the most efficient use of land whilst responding to local character and context.

M&G requests that the wording of bullet D4(1n) on space standards be amended as follows, to repeat the approach used for D4(i). It is noted that the application of the standard should not compromise viability, and therefore there may be circumstances where full compliance is not possible and some flexibility in the application of the policy is necessary.

**POLICY D4: Character and design of new development**

(1) High quality design is expected in the borough. All developments will:

(n) be expected to have regard to and perform positively against the nationally described space standards as set out by the Department of Communities and Local Government (DCLG).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**POLICY D4: Character and design of new development**

(1) High quality design is expected in the borough. All developments will:

... (n) be expected to have regard to and perform positively against the nationally described space standards as set out by the Department of Communities and Local Government (DCLG).
<table>
<thead>
<tr>
<th>Comment ID: pslp171/1080</th>
<th>Respondent: 17320801 / Terence O'Rourke Ltd for M&amp;G Real Estate (Andrew Elliott)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent: Terence O'Rourke for M&amp;G Real Estate (Andrew Elliott)</td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
<tr>
<td>Reflecting M&amp;G’s representations on the lack of flexibility in Site Allocation Policy A6, objection is made to Policy E7 (1) (a) which should be reworded to read:</td>
<td></td>
</tr>
<tr>
<td>a new retail-led mixed-use development of approximately 45,000 sq m (gross) of additional comparison good floorspace on the North Street regeneration site within its primary shopping area</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
<tr>
<td>Policy E7 (1) (a) should be reworded to read:</td>
<td></td>
</tr>
<tr>
<td>a new retail-led mixed-use development of approximately 45,000 sq m (gross) of additional comparison good floorspace on the North Street regeneration site within its primary shopping area</td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1079</th>
<th>Respondent: 17320801 / Terence O'Rourke Ltd for M&amp;G Real Estate (Andrew Elliott)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent: Terence O'Rourke for M&amp;G Real Estate (Andrew Elliott)</td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
<tr>
<td>The new policy wording offers the potential for affordable housing to be provided off-site, or paid for in lieu where it is agreed that on site provision or management is not practical. Whilst M&amp;G supports these options it should be clarified that viability evidence will still apply in considering whether any affordable housing can be delivered by a development.</td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
</tr>
</tbody>
</table>
Whilst M&G supports these options it should be clarified that viability evidence will still apply in considering whether any affordable housing can be delivered by a development.

Attached documents:

Comment ID: pslp17q/158  Respondent: 17320801 / Terence O'Rourke Ltd for M&G Real Estate (Andrew Elliott)  
Agent: Terence O'Rourke for M&G Real Estate (Andrew Elliott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The recent additions to the evidence base are welcomed and help to demonstrate that the Local Plan evidence base is up to date. Of particular interest to M&G is the Guildford Retail and Leisure Study Addendum, February 2017. This confirms that Guildford town centre accounts for most of the Borough’s forecast need for comparison goods floorspace. This reflects the centre’s strong market share of comparison goods expenditure and strength of the comparison retail offer. Nevertheless the forecast capacity results set out in the study addendum are lower than those identified for the town centre in the 2014 retail and leisure study update covering a similar period. The identified reasons for this include lower forecasted expenditure growth Borough-wide.

The report confirms that capacity forecasts carried out over a long period of time are inherently less certain and should be treated with caution. This is principally due to the impact of economic, demographic and market trends on the key assumptions and forecasts. As a result the report authors, Carter Jonas, advise that greater weight should be placed on the short-term forecasts carried out over a three-five year period in accordance with National Planning Practice Guidance (NPPG). M&G supports these comparison goods forecasts and findings and the appropriately emphasised caution on their use over a long time period.

The study update also considers forecast need for new commercial leisure provision, focusing on cinema, food and beverage, and fitness and leisure provision. Opportunities for additional cinema screens (new/ expanded cinema facility in Guildford town centre) is identified together with potential to support new food and beverage floorspace with demand likely to be focused on Guildford town centre. The leisure assessment also identifies the potential need for two branded gym facilities based on projected population and current participation rates in this leisure activity, again with demand likely to be focused on Guildford town centre. M&G supports these commercial leisure provision findings.

The content of the Borough Council’s Retail and Town Centres Topic Paper, 2017 is also of particular interest to M&G. The topic paper correctly identifies at paragraph 4.30 that the methodology for forecasting floorspace needs used in the retail and leisure study and addendum is based on a standard constant market share approach, which does not take into account any potential uplift in market shares and capacity (quantitative need) that could occur due to the ‘claw back’ of expenditure from competing centres to new retail floorspace in town centre locations, for example the new anchor store as part of the proposed North Street scheme.

At 4.39 the topic paper correctly summarises that the evidence underpinning the retail study points towards strong indicated signs of interest in Guildford town centre from food and beverage operators, which has been reflected in an adjustment to
the capacity of the allocation for the North Street site A6 in the Local Plan, from 3,000 to 6,000 sq m (approx.) food and drink (A3) uses and drinking establishment (A4) uses between the 2016 and 2017 versions of the Submission Local Plan.

At 5.6 and 5.7 the topic paper identifies from the retail and leisure study addendum that forecasted comparison retail growth requirements have reduced and taking into account the revised need figures and a “reconsideration of the capacity and suitability of the North Street redevelopment site for comparison retail and other uses” the proposed retail floorspace capacity is reduced for A6 North Street from 45,000 sq m gross to 41,000 sq m gross. M&G comments further on this in its representation response to Policy A6.

At paragraph 6.1 the topic paper refers to providing an increased residential element to the allocated North Street regeneration site of up to 400 homes (C3 use) in response to comments raised on the 2016 Submission Local Plan, but also implies that additional capacity for residential is partly in exchange for reduced comparison retail floorspace (given updated forecasts of comparison retail need in the retail and leisure study). M&G comments further on this in its representation response to Policy A6.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3070  Respondent: 17321089 / David Banham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:
The increase to 60 homes in place of 45 homes is 33% more and too much
It ignores all the hundreds of previous objections made by local people
It will worsen access and traffic problems in Tannery Lane and at the A247 junction
It will make erosion of the Green Belt in our village worse
It will make surface water flooding, which is already bad, even worse
It will impact open countryside views from the River Wey Navigation
It will worsen traffic congestion in the local area which is already busy and often sees heavy traffic during and after peak hours, even when the major roads have cleared.

There is no infrastructure, (schools, roads, shops, etc.), in place or proposed, to support the increased demand that will result from this development. It will increase the risk posed to cyclist using Tannery Lane and the surrounding roads. There is no proposal to improve cyclist's safety on these narrow country roads that will see an increase in motor vehicle traffic. This is of particular concern to me as I transport my children to and from nursery, by bicycle, along these roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3071  Respondent: 17321089 / David Banham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy M3 change at Garlick's Arch because:
It ignores all the thousands of previous objections made by local people
There is no proven demand for Travelling Showpeople plots in this location
It is beautiful permanent Green Belt and no "exceptional circumstances" exist
It will cause over-development of our village and the number of homes is excessive
It is exquisite ancient woodland that existed at the time of Elizabeth I
It will join up Ripley and Send and defeat the key purpose of Green Belt
It is subject to frequent flooding and is currently a flood zone 2 allocation
It is contaminated by lead shot accumulated over fifty years
It will generate excessive traffic that will block up the local roads of Send and Ripley
There is not currently sufficient infrastructure, roads and schools, to support the proposed increase in demand that will be placed upon the area with the proposed plans.
The additional traffic will cause a significant increase in rush hour traffic trying to gain access to the A3, which already queues through the villages of Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3072  Respondent: 17321089 / David Banham  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:
It was deleted from the 2014 draft because of all the objections made previously

The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land
There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
The impact on small surrounding roads will create traffic gridlock
It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1410  Respondent: 17321089 / David Banham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:
- The impact on small surrounding roads will create traffic gridlock
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/940  Respondent: 17321473 / ACM (Oli Sussat)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It would be really nice to have The Electric Theatre recognised in section 4.4.54 of E6, alongside G Live and The Yvonne Arnaud. Especially as it continues to be a Council owned venue that we have pledged to operate for you for the next 20 years. Thanks for any consideration you can give this request.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1159  Respondent: 17321665 / BOC Limited (Glen Jenkins)  Agent: Savills (Andrew Fido)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy E2: Locations for new employment floorspace**

This representation is made on behalf of BOC Limited who is a major employer both across the UK and within Guildford specifically as their UK headquarters are based on the Surrey Research Park.

BOC is strongly supportive of the general thrust of the plan and specifically welcome the designation of the Surrey Research Park (SRP) as a Strategic Employment Site under policy E1, the extension of SRP under policy E4 and the job targets set out across the other employment policies. These clearly reflect the evidence base (including the ELNA 2017) which confirms the importance of SRP to the local economy.

However, there are elements of Policy E2: locations of new employment floorspace which BOC are concerned are at risk of being found 'unsound'.

Whilst criterion (2) confirms that *'the sequential approach does not apply to proposed employment floorspace included in the Site allocations in the Local Plan'*; such as the extension to the SRP under policy E4 (A26), the policy as currently worded would require any site wide employment redevelopment proposals for existing Sites within the SRP to meet the sequential test.

BOC is concerned that this unnecessarily restricts the expansion and investment plans of those businesses already located on SRP, who are equally allocated within the proposed Strategic Employment Site under draft policy E2. This would be contrary to the NPPF, notably the following objectives:

1. 'Building a strong, competitive economy is a key policy objective and there is a clear commitment to *‘securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths’* (para 18 – 22);
2. ‘Planning should operate to encourage and not act as an impediment to sustainable growth’. (Para. 19);
3. investment in business should not be *‘over-burdened by the combined requirements of planning policy expectations’* (para. 21); and,
4. ‘local planning authorities are expected to *‘support existing business sectors, taking account of whether they are expanding or contracting’*, whilst ensuring that policies are *‘flexible enough to accommodate needs not anticipated in the plan and to allow for a rapid response to changes in economic circumstances’* (para. 21, bullet point 3).

BOC is also concerned at the definition of transport interchanges at paragraph 4.4.15 which limits the definition to *‘rail stations and bus stations within the urban areas or in close proximity to the district centres and Strategic Employment Sites’. *They are concerned that this definition has overlooked the combined public transport node of the Royal Surrey County Hospital, the SRP and the Manor Park Campus which are served by a combination of 11 bus services of which three run at least every 20 minutes in the AM peak including the following:

- route 4
- route 5
- route 14
- route 17/17A
- route 26
- route 27
- route 36/37
- route 38
- route 520
- route 697
- route PT5

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy changes sought:

BOC request that criterion 2 to policy E2 is amended to confirm that the sequential approach will not apply to proposals for the site wide redevelopment or intensification of existing employment premises within the defined strategic employment sites (including the SRP).

BOC request that the definition of public transport interchanges at paragraph 4.4.15 is amended to include the public transport node of the Royal Surrey County Hospital / Surrey Research Park / Manor Park Campus.

Attached documents:

Comment ID: pslp171/1160  Respondent: 17321665 / BOC Limited (Glen Jenkins)  Agent: Savills (Andrew Fido)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E4: Surrey Research Park

This representation is made on behalf of BOC Limited who is a major employer both across the UK and within Guildford specifically as their UK headquarters are based on the Surrey Research Park.

BOC is strongly supportive of the general thrust of the plan and specifically welcome the designation of the Surrey Research Park (SRP) as a Strategic Employment Site under policy E1, the extension of SRP under policy E4 and the job targets set out across the other employment policies. These clearly reflect the evidence base (including the ELNA 2017) which confirms the importance of SRP to the local economy.

However, there are elements of Policy E4: Surrey Research Park which BOC is concerned are at risk of being found 'unsound'.

Part 1 of policy E4 seeks to restrict the existing SRP and the proposed extension detailed in A26 to: ‘business use comprising offices, research, development, design and innovation activities, in any science, including social science, falling within Use Classes B1 (a), (b) and (c) of the Town and Country Planning (use Classes) Order 1987 (as amended), that is complementary to the activities of the University of Surrey’.

Whilst BOC is supportive of the overall policy objectives and broad thrust of this policy there is concern that the restriction of business uses to those ‘in any science...that is complementary to the activities of the University of Surrey’ is potentially overly restrictive and inflexible.

This is considered to particularly be the case for those businesses operating on the existing SRP, some of whom have been in place for a number of years and who require the flexibility to amend or expand their operations in response to their particular corporate requirements.

Whilst the existing flexibility of criterion (3) is appreciated, it is considered that the policy would best be reformulated to be more reflective of the differences between the needs of existing established businesses operating from the SRP, and the new businesses which would be attracted to the SRP extension.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy changes sought:

BOC request that Policy E4 is simplified and amended such that the policy deals solely with the extension to SRP as shown in policy A26, with restrictive provisions on new businesses uses within this area as appropriate. This would allow the existing businesses on the existing SRP to be governed by policies E1 and E2, with a less onerous restriction to general B1 uses, particularly head office functions.

Attached documents:

Comment ID: pslp173/328  Respondent: 17322945 / James Janion  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see my objections to the local plan for Guildford but more specifically to Site A43 Garlicks Arch, A58 Burnt Common and Site A42 in Tannery Lane.

- Allocation of housing to green belt in Ripley seems unbalanced against the entire borough plans and indeed it is not clear how the plans resolve increased traffic and population to several villages which seem wholly inappropriate considering other non green belt site availability.
- The inclusion of 6 Travelling Show people plots with associated storage facilities is entirely inappropriate in a rural environment within the Green Belt and there is no identified need within the Local Plan
- The allocation of 6 Travelling Show people plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. The Plan is self-inconsistent and therefore not properly constituted.
- The potential for a substantial increase in industrial floor space from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document
- The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a and does not allow for full and proper consultation
- The increase in housing in A42 Tannery Lane does not demonstrate any care or consideration to the accessibility and traffic flow of this rural lane. As a cyclist this road is already a dangerous route to use and an substantial increase will further increase risk to road users, including pedestrians (who have to walk in the road) and cyclists.
- The A42 Tannery Lane proposal does not make any consideration to the impact on the road joining the main carriage way to the A3. What is already a dangerous junction the increase in traffic will further add to the danger the cross roads with Sandy Lane already creates with poor visibility, cars parked creating hazards and lead to increase bottlenecks during peak traffic times as well as danger to other road users such as cyclists and pedestrians.

As a council, this proposal represents a clear disregard for a beautiful part of our land, your proposal does not add value to this area but will cause and create damage to several villages, untold people and has the potential to cause danger to local residents, cyclists, pedestrians and wildlife in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

The attached letter has been prepared by WYG on behalf of the site owner of Burnt Common Nurseries - The Newship Group. It is submitted in support of the Proposed submission Local Plan: Strategy and Sites 2017 (Regulation 19 submission) insofar as it proposes the allocation of Burnt Common Nurseries for commercial development. Further information is contained in the attached.

Kind regards

[text of attachment reproduced below]

Introduction and Summary case
We are writing on behalf of our clients, Burnt Common Nurseries Ltd, to support the allocation in the emerging Guildford Local Plan of the land known as Burnt Common Nurseries, London Road, Send, for a minimum of 7,000sqm of floorspace falling within Use Classes B1(c), B2 and B8.

Please find enclosed with this letter:
- A statement from Lambert Smith Hampton that examines the local industrial market, the projected need and comments on the appropriateness of the proposed allocation for employment use;
- A Technical Note from RGP on the impact of the proposed allocation on the local highway network; and
- Historical photographs showing the commercial nursery buildings on the site (now demolished).

The allocation is strongly supported to meet the required quantum of employment floorspace identified in the Council’s Employment Land Needs Assessment (AECOM, March 2017), for the Plan period (2015-34) and provide flexibility to help meet future needs/ additional capacity within the Plan period, should this be required.

The Burnt Common Nurseries site (BCN) can accommodate the required minimum quantum of development – a minimum of 7,000 square metres of employment floorspace – at a very early stage in the Plan period and with no significant adverse impact on the highway network, the environment, the character of the surrounding area or residential amenity.

The site is very well screened, particularly from the A3 and nearby limited residential development. As a result, with the exception of the access points from the B2215, development of the site would not be materially visible from the surrounding public realm.

There are very strong reasons for developing the BCN site for new floorspace within Use Classes B1(c), B2 and B8, which are discussed below.

Taking into account all planning considerations, the site is one of the most sustainable and deliverable locations in the Borough for new employment development over the Plan period. It is also able to be brought forward at a very early stage in the Plan period, which supports the local economy, further contributing to sustainability objectives. Accordingly, the site has been allocated in the emerging Guildford Local Plan for a minimum of 7,000sqm of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) with a potential for further industrial floorspace to meet future borough needs.

The wording of the Policy is strongly supported as it aims to facilitate development in the short term to meet immediate identified need, whilst providing flexibility for the future.
Landowners credentials
The Newship Group is a family owned business with mainly manufacturing and distribution companies across the UK and Europe. The Group was founded 40 years ago and during this time it has built a number of industrial estates, some of which remain within the Group. Today the Group manages over 1,000,000 sqft of industrial buildings.

Over the last four years, the Newship Group has worked closely and positively with the Council to bring forward the undeveloped part of the site for business use.

Site ownership
The proposed allocation and the existing employment land it surrounds are in one ownership - Burnt Common Nurseries Ltd. which is part of Newship Group. The site comprises of three warehouses totalling approx. 5,110 sqm (55,000 sqft).

Site description
The site lies between Guildford to the south-west and Woking to the north. The site has good access to the highway network with the B2215 leading directly onto the A3 at Ripley and just one junction up the A3 is junction 10 of the M25.

The site is currently an undeveloped greenfield site comprising approximately 10.6 ha. in size. It lies within the Green Belt, but adjacent to the existing settlement of Burnt Common and Send Marsh.

It comprises land that was previously occupied by vast commercial greenhouses on gently undulating ground (see enclosed photographs). It is enclosed by tree belts to the north and east, tree cover to the south and hedgerows to the east. Urban influences are provided by the residential properties to the east on the Clandon Road behind a row of mature trees, and the adjacent commercial uses to the west (see enclosed photographs).

The overall land holding is not subject to any statutory or non-statutory landscape designations, or cultural or heritage designations. A disused public footpath lies to the east. This previously extended southwards, however the construction of the A3 severed this route and it has been formally extinguished.

The subject site is situated to the south of London Road (B2215), which was formally part of the A3. It is bordered to the south by the current A3, with an area of ancient woodland adjacent and separating the site from the A3.

The site is located directly off the little used but very safe south-west bound carriageway of the B2215. The south-west bound carriageway of the road is wide enough to accommodate two lanes of traffic and the southern side of the road is currently hatched and could be easily modified to safely accommodate the new access. A safe highway access from the site onto this road already exists. In 2016, the landowners transport consultants, RGP, assessed the transport impacts of the proposed development. This has been updated in light of the allocation. RGP conclude that:
- Suitable vehicular access can be provided;
- The development of a minimum of 7,000 sqm of employment floorspace would have a negligible impact in terms of the operational capacity of existing local road junctions; and
- The development can be delivered without the need for any additional slip roads to/from the A3 at Burnt Common.

RGP have found that the proposed development would have a negligible impact on the local highway network and development of the site could even deliver highway improvements that would benefit the operation of the Burnt Common roundabout. A copy of their assessment is attached to this letter.

The character of the area surrounding the site is a mix of residential and commercial. Within the site are three existing commercial units, which provide 5,110 sqm of floorspace in Use Classes B1/ B2 and B8. Directly adjoining the site to the east are residential dwellings, which form part of the area known as Burnt Common/ Send Marsh and this character extends north and eastwards.

Relevant background, history and assessment
The land at Burnt Common Nurseries is a previously developed site located within the Green Belt. The site was originally a commercial nursery, which opened in 1970 and employed 100 people, with seasonal workers increasing this figure to over 200 before Mother's Day and Christmas. The business consisted of three acres of commercial greenhouses to the east of the existing warehouse. In 1993 the Company was forced to close due to fluctuating exchange rates and overseas competition. The following year Consent was given for the demolition of the greenhouses and the change of use of the 40,000 sqft warehouse to unrestricted B8 use. In 1998 permission was granted for a further 11,000 sqft industrial building.
Following review of the Green Belt and Countryside Study (GBCS, 2013/’14), it was identified as a Potential Development Area (PDA) due to its sustainability credentials, accessibility and defensible boundaries.

The site was also identified in the Council’s Strategy and Sites Issues and Options Paper as having good potential for industrial (Use Class B2) and/or warehouse (Use Class B8) uses (see Information Sheet 59 in Appendix D of the Issues and Options Paper 2013).

The site was subsequently allocated in the Draft Local Plan (2014), for at least 7,000sqm of light industrial (Use Class B1c), general industrial (Use Class B2) and/or storage and distribution (Use Class B8) employment buildings and approximately 100 homes (Use Class C3). Land to the east of the existing warehouses was considered appropriate for new homes. Land to the rear and the west of the existing employment buildings was considered appropriate for employment expansion. This allocation was supported by local people and businesses.

The site was removed from the emerging Plan in 2015 in favour of land at Garlicks Arch, to the north-east of Clandon Road. The Garlicks Arch site was allocated for employment land and up to 400 homes. Allocation of the Garlicks Arch site for future development included, in a separate allocation, the provision of a north-bound on-slip onto the A3 and the potential for a southbound off-slip, creating a full four-way interchange between the A3 and Clandon Road (A247) in this location.

At their meeting on Tuesday 24th May 2016, Full Council agreed the Draft Plan for consultation, including the land at Garlick’s Arch and excluding BCN. There was considerable support from the public at the meeting for the Burnt Common Nurseries site.

Objections were voiced to the proposed allocation of land at Garlick’s Arch due to its size and the scale of development (not being commensurate with the scale and nature of the local area), openness in the landscape, poor sustainability credentials (in comparison to the Burnt Common Nurseries site), an inappropriate location for industrial and commercial development, because of the need to drive through a large part of the village to access the site, the risk of flooding, the potential for development to adversely affect three areas of ancient woodland and infrastructure constraints/impact on local services and facilities.

In addition, a very large number of local people and businesses made over 1,600 separate representations on the 2016 public consultation version of the then Proposed Submission Local Plan, specifically on the proposed allocations at Garlick’s Arch and Burnt Common Nurseries. The overwhelming majority of representations objected to the proposed development of Garlick’s Arch, requesting that the land at Burnt Common Nurseries be re-allocated instead. The reasons for this included the fact that the site is previously developed as an established employment site.

As a result, the land at Burnt Common Nurseries was re-allocated for a minimum of 7,000sqm industrial and warehouse development in the Proposed Submission Local Plan (2017). The Council is currently inviting comments on changes to the Proposed Submission Plan (a targeted consultation) prior to submitting the Plan for independent examination. One of the changes is that the amount of employment floorspace to be provided during the Plan period is amended in light of the ELNA. The changes to Policy E1 (in light of the ELNA) and the allocation of BCN as an industrial employment site are supported.

In allocating the site, the Council found that:
1. Land to the west of the existing warehouses is suitable for new employment uses (Use Classes B1c, B2 and B8); and
2. That if new homes are not provided (as shown in the previous 2014 Draft Local Plan), the whole of the site is suitable for new employment uses.

Thus, the entire site has been fully assessed and is considered suitable for employment development.

A credible location for employment development
The Newship Group is primarily interested in delivering employment floorspace and has been working towards achieving this objective in collaboration with the Council for a number of years. There are four main reasons why the Burnt Common Nurseries site is considered a credible location to deliver the employment space needed.

Firstly, it is an existing employment site with three industrial/warehouse buildings totalling 5,110sqm. It makes sense to consolidate employment at Burnt Common in association with existing buildings. It is also a more efficient of use land and would result in an external economy of scale, due to its location adjacent to similar enterprises.
Secondly, it offers the opportunity to deliver early expansion of employment floorspace, which is a key factor in achieving wider sustainability objectives. Widening the choice and availability of employment floorspace within the Borough supports the local economy by providing high quality accommodation in a convenient location, including incubator units for existing local businesses to move into, freeing up space for start-ups and smaller companies.

The site is not dependent on new access roads and there are no other site constraints. It is not in a restrictive flood zone. Given the lack of such constraints the Newship Group and Burnt Common Nurseries Ltd are in the position to submit a planning application and begin on-site straight away. That is important, because deliverability is a key issue when assessing the soundness of the emerging Plan at the Local Plan examination.

Thirdly, the BCN site is an acceptable site that does not compromise the purposes of the Green Belt. The site has a significant proportion of previously-developed land. The site is 10.7 hectares (26.44 acres), so a minimum of an additional 7,000sqm of employment space could easily be absorbed without having an adverse impact on openness or the five purposes of the Green Belt.

Fourthly, the site is sustainable, with good vehicular access that minimises the impact on the local highway network and local residents. The site is close enough to Send Marsh to provide shorter and more convenient journeys to work and promote rural sustainability, but is also sufficiently removed from the main residential areas and sufficiently screened by mature trees to minimise impact on residential amenity. The existing highway network facilitates convenient access to and from the A3 without needing to travel through the existing village.

The proposed development of the site was supported by local people and businesses through the public consultation on earlier versions of the emerging Local Plan. This is discussed in more detail below.

In summary, the site is a logical, reliable and credible allocation for employment space, with no material constraints. The Newship Group is committed to providing this, and its track-record offers peace of mind that it would be delivered early and to a high standard.

In overall terms the proposal to locate further employment space alongside an existing commercial employment estate (and a former commercial nursery) is the most logical and appropriate solution for the Burntcommon and Sendmarsh area. The Newship Group, operators of BCN Ltd, have significant experience of developing such employment sites. The lack of constraints and single ownership ensure that early delivery is achievable.

Site sustainability
A key consideration in assessing the suitability of the site for the size and type of development proposed is the need to ensure that the site is in a location that is sufficiently sustainable for the level of development envisaged.

The site is in a sustainable location given its size, character and function. As explained in more detail below, the size of the site is appropriate to the existing scale of the village and its character. A significant part of the site is also already in use for employment purposes and the proposed allocation is for additional Use Class B1(c), B2 and B8 commercial units. Given the allocation does not include any element of housing development, all of the site is suitable for industrial and warehouse units.

The site is accessible by public transport, walking and cycling and benefits from pedestrian and cycle access to a range of local services and facilities. The centre of Send Village, which has numerous shops and local facilities/ amenities, is within 2km from the site, with Send/ Ripley health centre and pharmacy only 500m from the site, and this is acknowledged by national policy as being an acceptable walking distance.

There are a number of bus stops within 400-500m of the site. Bus services 462 and 463 together provide an hourly service Monday to Friday between Woking and Guildford and also serve the residential areas of West Clandon, Send Marsh and Old Woking. Bus service 515/ 515A also provides an hourly service between Guildford and Kingston-upon-Thames Monday to Sunday.

In terms of a railway station, the main line station at West Clandon is approximately 2.5km to the south of the site and linked with the site by bus service 463. This station benefits from regular services between Guildford and London Waterloo. Guildford and Woking railway stations, which are accessible by bus services 462 and 463 are on the fast line to
London Waterloo, Basingstoke, Portsmouth and Alton. Existing rail facilities provide the opportunity to travel to the site by train as part of a linked bus or cycle journey.

There is an existing footpath on the northern side of the B2215, which provides connections to nearby bus stops and continues to other local facilities available in the vicinity of the site. There is also an existing on-road cycleway on both sides of London Road, which continues along the B2215 Portsmouth Road and provides a local connection to the centre of Ripley. A dedicated cycle route also runs alongside the A3 leading south-west towards Burpham (approximately 3.5km away), where it links to the wider cycle network around Guildford. There is a further shared pedestrian/ cycle link along the A247 between Burnt Common roundabout and local amenities in Send. To the south-east a further cycle link runs east along Tithebarns Lane connecting to a wider cycle network towards West Horsley. The site therefore benefits from good pedestrian and cycle connections.

The following local amenities are located in close proximity to the site – a petrol station with a Little Waitrose convenience store approximately 100m from the site, a doctor’s surgery and pharmacy 500m away. Further convenience stores, newsagents, takeaway restaurants, a café and a post office are located in Send village (via Send Barns Lane), approximately 2km away. Further amenities are available at Ripley High Street which is 3km away.

In addition to this the site is within easy access of both the A3 and M25, with the B2215 providing direct access to both.

The sustainability credentials of the site and its proximity to the facilities of Send have undoubtedly contributed to Burnt Common/ Send Marsh being classified as a village. With all of this in mind it is considered that the site is sustainably located and therefore accords with the principle of sustainable development in this regard.

Indeed, the ‘Send Marsh and Burntcommon – Major Village Expansion’ review carried out as part of the Green Belt and Countryside Study (2014), considered the sustainability credentials of the site as existing (as well as two other local sites). Significantly, it ranked the Burnt Common Nurseries site in first place out of all the sites.

As such, the Burnt Common Nurseries site has strong sustainability credentials.

Need for commercial development

In March 2017 AECOM prepared an Employment Land Needs Assessment for Guildford Borough. Whilst the assessment does not compare the existing supply and its capacity to accommodate the future demand for employment land or the suitability of sites to cater for future demand, it does state that ‘Businesses in Guildford are to be seen to be broadly satisfied with current premises, although a significant number of them see potential for growth in the future and are said to need space for expansion.’

The ELNA also finds that there is evidence of a lack of affordable start up and incubator units in the Borough.

Paragraph 3.3.1 states that the demand for employment space will be driven in part by population change. With a forecast growth in population of just over 15% over the Plan period (and a percentage of residents of working age that is comparable with both the South East and England as a whole), the demand for employment space is highly likely to increase.

The ability of the site to provide industrial and commercial units (including small and medium sized units) early in the Plan period will support the local economy by facilitating growth in at least the following ways:
- Increasing the overall supply (to assist in maintaining a sustainable form of development Borough wide);
- The provision of incubator units on the site; and
- Providing choice and flexibility for start-up businesses. This is particularly the case where existing occupiers are looking to expand (paragraphs 5.5.4 and 5.5.5 of the ELNA).

AECOM undertook consultation with property market experts to inform the ELNA. The feedback received is that the current supply of industrial and storage premises is not meeting existing demand. This is exactly the finding of Lambert Smith Hampton (LSH) in their report dated August 2016, which was submitted in support of the request to re-allocate the Burnt Common Nurseries site. The lack of available sites (and those sites that are available tend not deliver the quality and space needed), act as a constraint on demand (see paragraph 5.6.3). Thus, economic growth would be supported through the provision of high quality stock that benefits from excellent road access, such as the Burnt Common Nurseries site.
Lambert Smith Hampton statement
The statement by Lambert Smith Hampton (LSH) on the need for small industrial and commercial units within the Borough has been updated. This updated statement (dated June 2017) is attached to this representation for consideration. LSH continue to find that the existing stock of buildings is very low and insufficient to meet future needs. In addition, the quality of the available stock is poor, which itself acts as a deterrent to potential occupiers (see LSH statement paragraph 4.26).

Thus, LSH conclude that there has been and remains insufficient employment land supply to meet future growth needs and so new employment sites are required and particularly to come forward at an early stage in the Plan period.

The LSH statement confirms that the Burnt Common Nurseries site is a suitable location for commercial units due to its proximity and accessibility to the principal road network and is able to be developed quickly.

The LSH statement explains that the emerging Plan does not appear to specifically account for the loss of employment land (i.e. allocations of land currently in an employment use, proposed to be developed for a non-employment use). There are examples of this in the emerging Plan i.e. Kernal Court and Wey Corner, both on Walnut Tree Close, Guildford, for residential accommodation etc. As a result, this loss should be re-provided elsewhere in the Borough to avoid a reduction in employment floorspace, particularly at an early stage in the Plan period.

The need for flexibility
The Proposed Submission Local Plan (2017) makes provision for between 3.7 to 4.1ha. of additional industrial land to help support the economy. The Plan explains that this is a higher level of development than experienced in Guildford during the previous Plan period and represents an increase in employment floorspace.

The Council has resolved to plan for a central case of between 3.9ha. and 4.1ha. of additional industrial employment land during the Plan period (2015-2034). The majority of the proposed new employment floorspace is allocated in urban extensions to Guildford; as part of the Slyfield Area Regeneration Project (SARP), Blackwell Farm, Gosden Hill Farm and at the former Wisley airfield. These are strategic locations that will take many years to come forward.

The Employment Land Topic Paper finds that a ‘large proportion of the net additional land requirement for industrial/storage may be met through the permissions which have been consented but which have yet to be implemented. This includes up to 7,000sqm (on 1.4ha.) at Henley Business Park and 1,800sqm at Woodbridge Meadows. There is the possibility that some pipeline developments may not come forward at all, or as many of the permissions are flexible (B1c/ B2/ B8), there is uncertainty into exactly which Use Class may be built out. The two main locations for industrial and storage development are on Burnt Common (7,000sqm) and as part of the Slyfield Area Regeneration Project (6,500sqm additional).’ Paragraph 7.7 of the LSH statement quotes paragraph 4.50 of Guildford Borough Council’s Employment Topic Paper (June 2017), which states that ‘The delivery of [SARP]… is not expected until the latter part of the plan period.’

There is clearly a need for flexibility in the provision of employment land, particularly industrial land, to accommodate needs as they arise and enable the Plan to respond to changes in the wider economy. The Burnt Common Nurseries site achieves both objectives, by delivering new employment floorspace very early in the Plan period and offers the flexibility required to respond to changing economic circumstances. The deliverability and flexibility of the site to support wider sustainability objectives is a key strength and it is therefore important that the flexibility as currently expressed in the proposed allocation is retained.

The allocation of land at Burnt Common Nurseries facilitates the early delivery of employment floorspace that has been demonstrated to be urgently needed. Provision of a range of commercial units (including small and medium sized), would contribute to the objectives of sustainable development by helping to meet the existing need for high quality and conveniently located industrial and warehouse floorspace and facilitate job creation opportunities at an early stage in the Plan period.

The proposal can be delivered very quickly due to the lack of site constraints, the fact the site is all in one ownership, there is an existing access onto the road network (B2215), development of the site would have a very limited impact on the local landscape and Green Belt (due to its heavily enclosed nature) and would enable the openness of the Green Belt and its open character to remain and continue throughout the Plan period.
Also, in accordance with sustainable development objectives, the emerging Local Plan seeks to support the future economic, environmental and social sustainability of rural settlements, commensurate to their size, character and function.

The scale of the proposed development is commensurate with the size, character and function of Burnt Common/ Send Marsh. The settlement is a village and increasing its size by 7,000sqm + of industrial/warehouse floorspace would not harm the size, character or function of the location. The allocation supports the growth of this part of the Borough, which is planned for significant housing development in the Plan period. The provision of employment land (delivered early in the Plan period) in the vicinity of new housing development contributes to sustainable development as envisaged in the NPPF (paragraphs 7 – 10). This is recognised in the emerging Local Plan.

There are also local services and facilities within close proximity to the site, which offer an existing facility for employees. Provision of facilities for employees will also be made on the site however, with space for a food kiosk, a sitting out area and landscaped open space.

The above evidence supports the allocation of the Burnt Common Nurseries site for development in the emerging Local Plan.

Unique location
As described above, the site is wedged between existing roads, comprising the A3 and the old A3 (now B2215) and existing development fronting Clandon Road (A247).

From a review of the GBCS the site falls within a parcel of land (B13-D), which as previously stated, has been identified as a PDA. Paragraph 1.37 of Volume I of the GBCS states that the land parcel in which the site falls within has the potential to accommodate appropriate development without compromising the purposes of the Green Belt in which it is located. It is noted to be an area that is surrounded by defensible boundaries and these include built physical features (roads) and significant tree screening.

The site, and indeed wider land parcel in which it is located is isolated from the wider green belt by the A3, the London Road and the Clandon Road which surround the site, making it an enclosed triangular parcel of land that is very much separated from the wider Green Belt. This helps to further ensure that development of the site (and wider land parcel) would not harm the character or appearance of the Green Belt in which it is located and would not set a precedent.

This scenario is very similar to, and is supported by, the Burpham Court Farm development known as Weybrook (now a housing development with a large Sainsbury’s supermarket), which is also between the A3 and an A3 slip road. If new slip roads were provided at Burnt Common/ Send Marsh, this would improve its attractiveness to businesses from further afield.

The Council accepted the above and has allocated the site in the Draft Local Plan for commercial development.

Emerging Planning Policy
Policy D4 of the Submission Local Plan (2016) explains that development must contribute towards achieving high quality and attractive places. The proposed allocation of the Burnt Common Nurseries site would be of high quality and use land in an efficient manner, whilst retaining and enhancing a significant landscaped buffer around the perimeter of the site, which would improve its attractiveness. No important public views would be affected. As explained further below, the site is accessible and the proposal would create safe access to the site by a variety of modes. Crime and disorder would be discouraged through designing the layout of the commercial units to overlook each other and the parking and turning areas.

The design and orientation of the proposed units would make sure that there would be no unacceptable impact on amenities in terms of privacy, noise, vibration, pollution, dust, smell and access to sunlight and daylight.

Proposed Policy A58
Policy A58 (of the Proposed Submission Local Plan) allocates the site for a minimum of 7,000sqm of either or a mix of B1, B2 or B8 floorspace, with the potential for further industrial floorspace to meet future Borough needs. The allocation is supported as currently proposed as it provides an appropriate Green Belt buffer between the proposed north-eastwards expansion of Guildford (Gosden Hill Farm allocation) and the existing built up area of Send Marsh/ Burnt Common.

In addition, the flexibility of the Policy is supported. The Council has allocated various sites for employment development in the Plan period; however should these sites not come forward as anticipated it could have an impact on the overall
supply of employment land in the Borough. Furthermore, other existing sites could potentially be lost to non-employment uses. As a result, the potential to release additional land for employment floorspace during the Plan period, to help meet need, is a prudent approach and supported.

The description of the site in Policy A58 refers to the existing use as pastoral farmland. This description of the site is inaccurate; it would be more appropriate to describe the site as former commercial nursery.

Public consultation
The Local Planning Authority has undertaken a series of comprehensive public consultation exercises on the emerging Local Plan, gaining local opinion on key issues affecting the Borough and informing the Authority of the view of local people in deciding how best to accommodate future development. A clear message made by local residents throughout the Borough is the need for the timely provision of infrastructure to support planned new development.

In relation to future development at Send Marsh/ Burnt Common, the overwhelming perspective of local residents is that the BCN site is a sustainable and appropriate site for development that would not have an adverse effect on existing infrastructure, or the five purposes of the Green Belt. BCN is recognised as a previously developed site, which should be used to best effect, in advance of Greenfield land. It is noteworthy that the Parish Councils in the area have not objected to the allocation of land at BCN; on the contrary they have supported the allocation of BCN and questioned the logic of de-allocating it in favour of a larger Greenfield site, the development of which would not be commensurate with the scale and nature of the existing area. Indeed, Send Parish Council advised in their response to the 2016 consultation that they consider BCN to be an appropriate allocation and requested it be reinstated in the Proposed Submission Plan.

Deliverability
In terms of deliverability the site is available and deliverable with 1-5 years (subject to securing planning permission). The owners are committed to developing the site for employment use and are undertaking the necessary assessments to support an application.

The proposed development of the Burnt Common Nurseries site includes space around the buildings, some of which will include sitting out areas. The environment will be enhanced through the provision of soft landscaping to strengthen wildlife links to and from the adjacent ancient woodland and noise generating sources would not be located unacceptably close to existing residential development.

Finally, the provision of a range of commercial unit sizes, commensurate with the size, character and function of Burnt Common/ Send Marsh, benefits the local area without having a serious adverse impact on local services and facilities. It is clear therefore that a development of this type contributes to the three main aims of sustainable development – social, economic and environmental.

Conclusion
It is considered that given the subject sites’ location, its sustainability credentials and the Council’s economic assessment and GBCS it represents a prime opportunity for commercial development that it has been demonstrated is commensurate with the size, character and function of the existing settlement.

It is considered that a minimum of 7,000sqm floorspace can be achieved on the site, which would represent a suitably low density of development. This in turn enables the site to retain an open and spacious character, and retention and sympathetic enhancement to the existing ancient woodland through strengthening the tree belts around the site to provide wildlife corridors to adjacent areas.

The allocation of the BCN site in the emerging Local Plan is supported for the following reasons:

- The site is in a sustainable location, with very good transport accessibility.
- Development for a minimum of 7,000sqm employment floorspace would have a negligible impact on the operation of the existing highway network (see RGP’s Transport Impact Assessment).
- The site is part previously developed.
- The Council identified and allocated the site for future development in the emerging Plan.
- The site has defensible boundaries which will ensure that its development will not harm the purpose or openness of the wider Green Belt.

- The site is isolated from the wider Green Belt.

- The site is not constrained by any other sensitive planning designations.

- The site is deliverable within 1 – 5 years.

- The site provides the opportunity for expansion subject to future need.

- The site offers flexibility to also make for the loss of supply of existing sites (see conclusion of LSH statement).

- The site is similar to the previously developed site Weybrook in Burpham (now a housing development with a Sainsbury’s supermarket) which also lies between the A3 and a slip road.

- The site would not impact materially on any existing residential properties.

- The site is well screened already by mature tree planting, which can be further enhanced.

With all of the above in mind we assert that the subject site is suitable, developable and deliverable for commercial development. We support the allocation of the site for at least 7,000sqm employment floorspace in the Council’s emerging Local Plan and exclusion from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2017-07-21 Transport Impact Assessment TN02.pdf (3.8 MB)
LH_Burnt Common site_AL-012 Site Location Plan 1-1250.pdf (194 KB)
Burnt Common Nurseries site photo's 2016.pdf (1.0 MB)
Land at Burnt Common Statement - June 2017.pdf (1.6 MB)
Burnt Common Nursery site photos 1990's final.pdf (5.1 MB)
Draft Burnt Common Nurseries Local Plan Reps letter July 17.pdf (367 KB)
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/961  Respondent: 17323265 / Simon Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/958  Respondent: 17323265 / Simon Owen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.
I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/965   Respondent: 17323265 / Simon Owen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students Ire accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/970</th>
<th>Respondent: 17323265 / Simon Owen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H3</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers
under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Table:

| Comment ID: | pslp171/962 | Respondent: | 17323265 / Simon Owen | Agent: |
| Comment ID: | pslp171/962 | Respondent: | 17323265 / Simon Owen | Agent: |

| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ), is Sound? | ( ), is Legally Compliant? | ( ) |

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to
build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/964  **Respondent:** 17323265 / Simon Owen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/957</th>
<th>Respondent:</th>
<th>17323265 / Simon Owen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/133</th>
<th>Respondent:</th>
<th>17323265 / Simon Owen</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.
2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/134  Respondent: 17323265 / Simon Owen  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp17q/135  Respondent: 17323265 / Simon Owen  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/136  Respondent: 17323265 / Simon Owen  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID: pslp173/336  Respondent: 17323585 / Jane E Foxon  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID: pslp173/337  Respondent: 17323585 / Jane E Foxon  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base**

I object to the proposed Infrastructure Schedule (Appendix C)
The Infrastructure Schedule sets out the key infrastructure requirements the Plan depends on. There is no schedule for Garlick’s Arch (A43), so the Plan takes no account of the infrastructure required for this site. It is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)
The Plan’s proposed growth is based on the SHMA report, which says that 693 homes a year are required by the borough, which is more than double the figure of 322 used in previous plans.

But because the Council will not publish the SHMA report, this figure cannot be verified. This lack of transparency is not right for consultation on the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/974</th>
<th>Respondent:</th>
<th>17323585 / Jane E Foxon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)
There is too much traffic in our villages already and this plan will cause more congestion in Ripley, Send and Clandon, with no plan to improve that.

The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/981</th>
<th>Respondent:</th>
<th>17323585 / Jane E Foxon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of proper infrastructure planning for sites (Policy I1)
The Plan does not identify adequate infrastructure improvements to support the huge scale of development, especially at Garlick’s Arch (A43) which has no infrastructure projects in the Infrastructure Schedule to support it. Local services, utilities and sewerage, doctors etc. are at or close to capacity.

There are no plans to improve the capability of the medical and police/emergency services to cover the 5000+ houses in the north east of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/975  Respondent: 17323585 / Jane E Foxon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to development in areas which are at risk of flooding (Policy P4)
The Plan does not take adequate account of flood risk as required by National Planning Policy.

The site at Garlick’s Arch (A43) is classified by the Environment Agency as being in a higher risk than the Council’s own assessment. This area has flooded many times in recent years and therefore the Council’s assessment is not good enough to be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/976  Respondent: 17323585 / Jane E Foxon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the Borough Wide Strategy (Policy S2)
GBC’s proposal for 13,860 new houses without any constraints to reduce the overall housing figure, differs from all the other Borough Councils in Surrey.

The Plan is unbalanced across the borough; there’s too much development in the north east of the borough (Wisley [A35], Ripley/Send [A43] and Clandon [A25]). 36% of all the Plan’s new housing is proposed in this area, which has only 11% of the existing housing.
5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages.

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. The Plan is self-inconsistent and therefore not properly constituted.

The potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages. The plan states that “if the Traveller sites remains unsold, the future use of the land should have regard to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with specific consideration of the use of the land for affordable housing”. So even more travellers pitches and houses, which is unjustified.

Brownfield sites A4 and A34 have been removed from the Local Plan – meaning there is more pressure on Green Belt sites to meet the so-called housing “need”.

On Affordable Homes, the previous version of the plan (Policy 4.2.23) stated that Developers will be expected to provide land for affordable homes at nil value. Now it just says “Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” So the developers don’t even have to do build any affordable homes, just make a tidy cash payment to the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Promotion Site entrance. The Promotion Site is contained within defensible strong boundaries which, notably, include the busy B3000 along the northern boundary and the mainline railway to the eastern boundary.

In light of the site boundaries and the adjacent urban context, GBC’s Green Belt & Countryside Study (Volume V) concluded that the Promotion Site does not contribute strongly towards the purposes of the Green Belt. Furthermore, the site does not contribute to the qualities and characteristics of the wider Surrey hills AONB (a point which has also been confirmed in the Surrey Hills AONB office comments to an approved residential planning application directly adjoining the Promotion site.

Two independent landscape reports (by Enplan and Barton Willmore) have considered site No. 80 (SHLAA site 1140 and SHLAA site 2241) for the respective site promoters and those reports also confirm that Site No. 80 does not contribute to the Green Belt purposes or the wider qualities of the surrey Hills AONB.

**Requested Modifications**

In all of the above respects, Land at Pond Farm and Land South of New Pond Road is ideally placed to deliver a sustainable high quality residential development including affordable housing during the front end of the Plan period. The PSLP should therefore be modified by **allocating Site 80** for housing development and included the Promotion Site in the PSLP Part 2: Sites, and identified in Appendix F: Policies Map accordingly.

The PSLP seeks to deliver low and unambitious Annual Housing Target figures which will not meet the acute need for housing in the borough or meet the needs of neighbouring authorities or respond to inward migration from London. **The OAN should be increased accordingly to at least 693 dwellings per annum and Policy S2 modified accordingly.**

The PSLP’s Housing Strategy which weighs housing delivery to the back end of the Plan period (form 2026 onwards) will exacerbate housing need, lead to increased house prices and unaffordability, and lead to further increasing in housing waiting. The annualised Housing Delivery targets should be increased at the front end of the Plan period through the allocation of additional sites that are able to be delivered in the first five years of the Plan period. **The Annual Housing Target Table contained in Policy S2 should be modified accordingly.**

Land at Pond Farm and Land South of New Pond Road was identified in Volume V Section 17 of the Green Belt and Countryside Study (prepared in 2014). The Promotion Site was identified as **area F6** which was then further divided into F6A and F6B. In the summary, the Report identified the range of significant defensible boundaries surrounding the wider site and concluded that site F6 B, ‘...provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt’. Additional technical assessments both conclude site No. 80 does not contribute to the purposes of including land within the Green Belt. **Site No. 80 should be removed from the Green Belt and the Green Belt boundary modified and identified accordingly in Appendix F: Policies Map.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

The Policies Map should be modified to illustrate Land at Pond Farm and Land South of New Pond Road (B3000). the Policies Map should also be modified to illustrate a re-defined Green Belt boundary which omits Land at Pond Farm and Land South of New Pond Road.

**Attached documents:**
- Enplan_Pond Farm and part Land South of New Pond Road LVIA 210717.pdf (12.7 MB)
- Pond Farm_Draft Regulation 19 Reps.docx (1.2 MB)

**Comment ID:** pslp171/1008  **Respondent:** 17323713 / Obsidian Strategic (Philip Scott)  **Agent:** Obsidian Strategic (Philip Scott)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please refer to full Representations attached including an independent LVIA prepared by Enplan which demonstrates that Land at Pond Farm and Land South of New Pond Road (Site No. 80) does not contribute to the purposes of including land within the Green Belt due to the Promotion Site's defensible boundaries (including a busy road) and being more closely associated to the urban form of the settlement. The Pegasus Green Belt & Countryside Report also concluded that the site (area F6 B) ‘provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The extent of the Green Belt should be further modified. Site No. 80 (SHLAA ref. 1140 and 2241) should be removed from the Green Belt in accordance with the draft housing allocation in the July 2014 (Regulation 18) version of the draft Local Plan.

Attached documents:

Comment ID: pslp171/1001  
Respondent: 17323713 / Obsidian Strategic (Philip Scott)  
Agent: Obsidian Strategic (Philip Scott)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see attached letter relating to PSLP Policy S2

[text of attachment reproduced below]

We do not set out in detail here every point of contention with the PSLP Housing Strategy nor do we necessarily object to other individual proposed submission allocated housing sites. Those detailed matters will follow in due course through the Examination.

The main thrust of our objections to Proposed Submission Policy S2 is threefold:

1. Housing Need has been reduced significantly from the July 2014 (Regulation 18) and June 2016 (Regulation 19) versions of the Draft Local Plan (Regulation 18) at the very time when housing need both regionally and nationally appears to be very substantially increasing. We find this approach perplexing and we question its credibility and desirability.

2. GBC’s Housing Land Supply and proposed housing allocations have altered dramatically from the July 2014 (Regulation 18) and the June 2016 (regulation 19) versions of the Draft Local Plan. Not only is there a significant reliance on major strategic housing allocations which will take many years to deliver housing, but the housing delivery rates are now weighted to the back end of the Plan period exacerbating still further the previous accrued under-delivery of housing in the borough; and
3. In light of the above, smaller and modest sized sites which are deliverable and which the Local Plan evidence base show can be delivered without causing significant harm, have been omitted from the emerging Local Plan at the very time when they could help GBC meet its (and neighbouring authorities) acute housing need.

The Borough Council openly acknowledges that it has accrued a very significant housing delivery shortfall moving into the Local Plan review process. In that regard, the Borough Council has approximately 3.2 years supply of housing land against the Government’s minimum requirement of 5 years housing land supply.

Despite the context of housing delivery under-performance, GBC proposes to reduce the Plan period by one year and its start date has been rolled forward by 2 years. In this respect, we are concerned that there is no credible explanation offered to indicate why the Plan period has been reduced in mid-Plan making process. This change to the Plan period has also been accompanied by a very significant reduction in the overall housing requirement during the Plan period from 13,860 to 12,426 dwellings (a reduction of 1,434 dwellings). This very sizeable reduction comes precisely at a point in time when housing need at the local and national level is so acute. Furthermore, the proposed change to the Plan period appears to be out of step with the Strategic Housing Market Assessment (SHMA) and the Housing Market Area (HMA) which relate to the period 2013 to 2033.

The West Surrey SHMA itself has been partially updated since the July 2014 Regulation 18 and June 2016 Regulation 19 versions of the Local Plan. We also note that the Guildford Addendum Report (2017) takes account of the latest population and household projections, the latest ‘post-Brexit’ economic projections, and the 2015 mid-year population estimate. It is highly notable that the Addendum Report has resulted in a reduced Objectively Assessed Need (‘OAN’) for Guildford borough from 693 homes per year (2013 – 2033) to 654 homes per year (2015 – 2034). We struggle to understand how such a dramatic reduction in assessed housing need in Guildford borough bears any resemblance to the reality of the housing market in this part of the South East of England.

We consider that there are a number of in-principle matters for the examination to address in this regard.

Firstly; given the acute need for housing locally (and regionally) including record need and waiting times for affordable housing, together with significant unmet housing need in neighbouring Woking and Waverley boroughs, we question how such a dramatic reduction in the OAN is credible yet alone desirable? A further matter which we will seek to address at the examination is that Addendum Report appears to relate solely to Guildford borough rather than the wider strategic West Surrey SHMA area. The approach by GBC to calculating the revised OAN must brought in question especially in light of the duty to cooperate obligation.

Finally, on this particular matter, we question whether the approach taken by GBC to housing need and the PSLP’s approach to housing delivery through the Plan period is in accordance with the Government’s advice contained in the National Planning Policy Framework and the Planning Practice Guidance (‘PPG’).

The approach to Housing Land Supply through Proposed Site Allocations

GBC’s Housing Strategy is heavily reliant upon the delivery of several major draft housing allocation sites to bring forward a substantial proportion of new homes during the Plan period. GBC was also at pains throughout the PSLP committee debating process to assure elected Members, stakeholders, and local communities that the major housing allocations would only come forward when accompanied by necessary on and off-site infrastructure (including, but not limited to, new roads, utilities, and school provision). Consequently, GBC’s Housing Strategy in the PSLP (Regulation 19) is predicated on all necessary infrastructure required to facilitate the major housing site being delivered at the front end of housing scheme delivery.

The Housing Strategy has therefore been modified to illustrate that housing delivery on those major sites will be significantly delayed and as a result the PSLP housing strategy assumes a significant weighting of annualised housing delivery towards the back end of the Plan period.

We consider the proposed approach to the borough’s housing delivery will only serve exacerbate the acute need for housing (including affordable housing) in the borough which is already failing to perform against local targets and the Governments 5 year housing land performance requirements.
Indeed, not only is the Borough Council moving towards an Examination with a sustained housing land supply shortfall when measured against its 5 year housing land supply target but the Council is also proposing a housing delivery strategy which will result in an additional accumulated shortfall of 1000 dwelling units up to 2026 against its own annualised OAN housing target (until the draft allocated major housing sites come on stream from 2026 onwards):

- 2019/2020: 200 unit shortfall
- 2020/2021: 200 unit shortfall
- 2021/2022: 150 unit shortfall
- 2022/2023: 150 unit shortfall
- 2023/2024: 150 unit shortfall
- 2024/2025: 100 unit shortfall
- 2025/2026: 50 unit shortfall.

This annualised shortfall in housing delivery will be greater still if the Examination Inspector finds against GBC’s revised OAN methodology.

Despite this lamentable context, sites with potential to deliver housing in the first five years of the Plan period have been omitted from the emerging Local Plan despite being draft allocated from the 2014 draft Local Plan. For example, sites such as Pond Farm and Land South of New Pond Road (Site No. 80 (SHLAA site reference 2241) immediately adjacent to and contiguous with the built form and settlement boundary of Farncombe have been identified as part of the Borough Council’s housing evidence base and the Green Belt and Countryside Study as being suitable to deliver new housing.

In this context, the Promotion Site was draft allocated as part of site No. 80 (SHLAA site reference 1140 and part site reference 2241) in the Regulation 18 draft Local Plan: Strategy and Sites published for consultation in July 2014 as being suitable to deliver housing. The whole draft allocation site being 16 hectares of land to the south of New Pond Road (B3000) and intersected by Furze Lane. The wider site having been assessed by Pegasus Planning on behalf of the Borough Council as not contributing to the purposes of the Green Belt by virtue of its defensible boundaries and being well contained.

Site No. 80 was discounted from the Regulation 19 draft Local Plan (June 2016) absent of any fresh technical evidence to justify its omission.

The Promotion Site lies contiguous with the established form of Farncombe which itself lies in the adjoining borough of Waverley.

Waverley borough is also experiencing an acute need for new housing and its own Local Plan has been recently subject to Examination in July 2017 during which the Examination Inspector (Mr Jonathan Bore) has acknowledged that he is minded to recommend that Waverley Borough’s annualised housing target is increased significantly from 519 dwellings per annum to around 580 dwelling per annum (the precise amount is to be confirmed). The Waverley Borough Local Plan Inspector also questioned Guildford Borough Council during the Examination on its ‘duty to cooperate’ role with Waverley Borough Council given the absence of any truly cross boundary strategic housing sites or apparent sharing of housing land supply.

In this particular context, Farncombe is a sustainable settlement that benefits from a wide range of services and amenities including a railway station. Land at Pond Farm and Land South of New Pond Road is contained on its boundaries by physical built features including; New Pond Road (B3000) along the entirety of the northern boundary, the Portsmouth to London Waterloo mainline railway (to the eastern boundary) and established residential development (immediately south). The Promotion site itself is formed in two parcels intersected by Furze Lane which connects the village to the busy B3000. Furze Lane itself is well served by a bus services and a bus stop is located just 50 metres south of the Promotion Site entrance.

The Promotion Site is set within the designated Surrey Hills AONB and the Green Belt which covers (washes over) all the land between Farncombe and Guildford. However, in respect of the AONB, two independent landscape appraisals have
found that site No. 80 does not contribute to the characteristics and qualities of the wider Surrey Hills AONB and is impacted and influenced by the urban characteristics of the adjoining settlement. Furthermore, the Surrey Hill AONB office in its written comments to planning application reference WA/2014/1330 approved for 50 dwellings (immediately adjacent to the Promotion Site), acknowledged that the area south of the B3000 did not significantly contribute to the characteristic and qualities of the Surrey Hills AONB.

In respect of the Green Belt, it is highly notable that the Borough Council’s Green Belt and Countryside Study which is an important evidence based document also indicates that Site No. 80 does not perform strongly when measured against the purposes of including land within the Green Belt.

Nevertheless, the site promoters have commissioned further independent assessment of the site in terms of its visual impact on the landscape, its role as contributing to the purposes of the Green Belt and other technical matters including flooding and flood risk and we can confirm there is no impediment to delivering housing on the Promotion Site.

In term of the housing delivery and subject to the proper planning, design and layout of the Promotion Site we estimate the site can deliver between 90-100 dwellings including affordable housing at full policy rate, whilst still allowing for generous on-site open space and areas that will be kept free to allow for flood risk and established trees to be retained. The additional technical work commissioned by the Site Promoter effectively supports the earlier evidence base work undertaken by the Borough Council which led to the site’s draft allocation.

It is also evident that by allocating the promotion site, the Borough Council would be assisting housing need in Guildford Borough but also Waverley Borough which is a central objective of the duty placed on local authorities to cooperate in delivering housing land and meeting the need for housing at a more strategic level.

The promotion site is accessed via Furze Lane in an accessible location on the edge of a large sustainable village which has a wide range of services and facilities including a railway station which provides excellent links to Guildford (6 minutes) and onwards to London Waterloo. The settlement also offers local opportunities for employment and employment creation as part of a sustainable existing settlement. Furze Lane itself is well served by a bus services and a bus stop is located just 50 metres south of the site entrance. In all these respects, Land South of New Pond Road is ideally placed to deliver a sustainable and deliverable residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The OAN should be increased to at least 693 dwellings per annum and Policy S2 modified accordingly.

The Annual Housing Target Table contained in Policy S2 should be modified accordingly and re-weighted to facilitate significantly more housing towards the front end of the Plan period.

Attached documents: Pond Farm_Draft Regulation 19 Reps.docx (1.2 MB)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Enplan LVIA Pond Farm and part Land South of New Pond Road Part 3 - Country - Part 3.pdf (3.9 MB)
- Enplan LVIA Pond Farm and part Land South of New Pond Road Part 2 (2) - Countryside.pdf (2.2 MB)

Comment ID: pslp17q/146  Respondent: 17323713 / Obsidian Strategic (Philip Scott)  Agent: Obsidian Strategic (Philip Scott)


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The PSLP (June 2017) is not sound. The draft Plan has been published at a time when the Borough Council has administered a very significant under-delivery of housing when measured against 5 year housing land supply targets. Despite this lamentable context, the PSLP (June 2017) has amended the new Plan period, significantly reduced the OAN for the borough, and weighted annualised housing delivery to the back end of the new Plan period meaning that by 2027 (even using the Council's proposed reduced OAN) there would be an accumulated 1000 dwelling shortfall when measured against the minimum annualised housing deliver target. The PSLP will therefore exacerbate house prices, harm affordability, and lead to further shortages of new market and affordable housing.

The PSLP has not taken on any unmet need from neighbouring authorities, and at a time of record demand for family and affordable homes the Borough Council has placed too much reliance on major sites that will take many years to deliver and it has omitted sites that could come forward in the first part of the Plan period (for example: Land at Pond Farm and Land south of Pond Farm Road (Site No. 80) which the draft Local Plan had draft allocated in previous versions of the emerging Local Plan. Site No. 80 is well located to a sustainable settlement, is close to a railway station and existing bus routes and GBC's own evidence base assessments show that Site No. 80 can be delivered without causing significant harm to the landscape or Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Enplan_Pond Farm and part Land South of New Pond Road LVIA 210717.pdf (12.7 MB)
- Pond Farm_Draft Regulation 19 Reps.docx (1.2 MB)

Comment ID: pslp171/1002  Respondent: 17324225 / Surrey Heath Borough Council (Kate Galloway)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As you will be aware through our Duty to Co-operate letter dated the 19th January 2017, Surrey Heath is severely constrained in terms of available land for housing development, primarily through the Thames Basin Heaths Special Protection Area (SPA) and the need to provide avoidance measures in respect of the impact of housing on the SPA. The Borough also has large areas of MOD operational land and Green Belt.

Surrey Heath is now in the early stages of developing a new Local Plan and continues to develop a broad range of appropriate evidence to enable it to make robust decisions in respect of the extent that the Plan is able to meet the OAHN for Surrey Heath. However, the Council’s most recent Strategic Land Availability Assessment (July 2016) indicates that there will be a shortfall of land within the Borough to deliver the Council’s OAHN and, whilst the Council will consider spatial strategies that could reduce this shortfall in the course of preparing the new Local Plan, it is unlikely that Surrey Heath will be in a position to meet the full OAHN for the Borough.

As a result, it is possible that Surrey Heath will need to look to its Housing Market Area to accommodate any demonstrated unmet need. In the event that the Housing Market Area is unable to meet this need, the Council may need to approach other authorities who do not form part of the Hart, Rushmoor and Surrey Heath housing market area, but with whom the Housing Market Area shares links. This would include Guildford.

In view of the above and in light of the fact that Guildford has previously proposed a sustainable development strategy capable of delivering 1,400 additional houses over and above that set out within the current iteration of its Proposed Submission Local Plan, Surrey Heath would welcome further engagement with Guildford under the Duty to Co-operate to better understand why Guildford, under the terms of the updated Plan, is unable to allow for any flexibility to accommodate any demonstrated unmet need arising in any neighbouring Boroughs. Surrey Heath would also request that the Guildford Duty to Cooperate Topic Paper is updated to include Surrey Heath as a duty to cooperate body with which engagement on housing matters should be undertaken. This reflects the linkages between the Housing Market Areas covering Guildford and Surrey Heath and reflects the content of the Surrey Heath Duty to Cooperate Scoping Statement.

In response to the June 2016 consultation, Surrey Heath raised an objection to the proposed removal of Keogh and Pirbright Barracks from the Green Belt. The Council recognise that the Council’s concerns have subsequently been addressed by Guildford Borough Council, who have confirmed that the insetting the sites from the Green Belt is unlikely to result in any significant changes to the overall use or impacts of the sites as a result of their rural location and proximity to the Thames Basin Heaths Special Protection Area.

Surrey Heath Borough Council looks forward to continuing to working with Guildford in respect of housing and other Local Plan matters as each of the Authorities Local Plan progresses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1003  **Respondent:** 17324385 / Sainsbury's Supermarkets Ltd. (sir or Madam)  **Agent:** White Young Green Planning (Gary Morris)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
On behalf of our client, Sainsbury’s Supermarkets Ltd, we have considered the above document and at this stage we would like to make comments in respect of the Retail Impact Assessment threshold outlined within Policies E7, E8 and E9. These policies state that retail and leisure proposals over 500 sq m (gross) located outside of Guildford town centre, local or district centres, and where the site is not allocated, must be supported by a retail impact assessment.

The National Planning Policy Framework (NPPF) provides that Local Planning Authorities can set local thresholds above which proposals for town centre uses outside of town centres should be subject to an impact assessment. National Planning Practice Guidance provides clarification around the setting of local thresholds for retail impact. It states: “In setting a locally appropriate threshold it will be important to consider the:

• scale of proposals relative to town centres • the existing viability and vitality of town centres

• cumulative effects of recent developments • whether local town centres are vulnerable

• likely effects of development on any town centre strategy

• impact on any other planned investment” The impact threshold is supported by recommendations made within the Retail and Leisure Study Update 2014 prepared by Carter Jonas, however we note that this report considers that the district and local centres are mainly reliant on convenience goods shopping (9.22) and that the main food store anchors are important generators of linked trips. We also note that Carter Jonas do not identify any capacity for new convenience space for the time being. At para 9.23, Carter Jonas state that ‘in general terms, national retailers… have requirements for units of 500sqm gross and above.’ and that ‘stores with floorspace over 500sqm gross are unlikely to be a purely local facility and will tend to draw from outside of their immediate local catchment’. We consider that these statements are too general and, indeed, not correct. Sainsbury’s, for example, operates over 700 “Sainsbury’s Local” stores the majority of which have a floor area of under 500sqm – and this remains a key element of their ongoing requirements across the Country. Some Sainsbury’s Local stores have floorspace over 500sqm – but still cater to a local market. Whilst we acknowledge that the capacity assessment in the report suggests limited capacity in the coming years, we can see no evidence to suggest that there is a case for lowering the threshold to 500sqm gross. Indeed, we consider that a threshold as low as 500sqm would unduly stifle the convenience retail market and would deprive locations of valuable local facilities that are just as likely (if not more likely) to compete with out of town supermarkets as they are with town and district centres.

Carter Jonas later go on to suggest that a floorspace threshold below 500sqm would be too inflexible, but we would suggest that even 500sqm is too inflexible – particularly without any caveat on the locations where such an assessment would be required.

On the basis of the above, we object to the proposal to lower the threshold to 500sqm gross as there is insufficient evidence to support such a low threshold and because it would unduly restrict and stifle a competitive, but locally focussed, convenience retail market.

We request that we be kept fully informed of any further changes to the Local Plan and all other future LDF documents produced for consultation. In the meantime please please do not hesitate to contact us should you have any queries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have been reading about this proposed development for some time now.

Like many local residents I've been surprised and unhappy about development in an already over populated area.

As a resident in Old Palace Road I, like the rest of my owner occupier neighbours have put up with the result of an over expanding University.

The infill structure is so woefully inadequate to accommodate permanent residents and the student population, although through no real fault of their own have totally dominated and degraded the area through their lack of education in how to live in a community.

The greed of the University and possibly the council has sustained this problem and it continues.

My point is that we in the Guildford Park area have had enough!

It's a extremely stupid idea to build houses on the proposed site.

The ground is not fit to accommodate housing as has been proved and shown.

The area is already swamped with cars resulting in an already grid lock situation morning, evening and school pick up times.

I'm sure that the reasons all ready stated re the hedges and trees are very valid but on the infill structure and ground conditions alone surely this is a bonkers idea!?

I really can't understand why obviously intelligent people can think it a good, reasonable and viable one!

As for the powers that be at the Cathedral shame on you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 
In 1932 we were described as Ash Green in Estate Agents particulars, Frimley Health NHS, list us as Ash Green, Land Registry, Durham, the official Property Register state we are Ash Green,

1996 Guildford Borough Council, Director of Environment address us as Ash Green.

The Pension Service, Dept for work & Pensions address us as Ash Green The Co-operative Energy, address us as Ash Green.

HM Customs & Excise, address us as Ash Green.

1999 Guildford Borough Council, address us as Ash Green.

1995 Browns Estate Agents address us as Ash. Green The Post Office address us as Ash Green.

The Inland Revenue address us as Ash Green Sky address us as Ash Green.

South East Water address us as Ash Green.

DVLA address us as Ash Green.

I somehow think and believe that we live in Ash Green !! NOT Ash !

And yet I see in later correspondence 2007 and 2015 that Guildford Borough Council start addressing us as Ash. This seems to be a calculated preparation to influence the change in boundaries at this present time, definitely premeditated.

An unauthorised sign ASH GREEN has been erected on the approaches to the bridge on White Lane, just to confuse matters ! I wonder who put up this unauthorised sign ?!!

Tongham, Ash, and Ash Green are historic villages, but Ash Green is rural not urban.

It is imperative that these villages have green space between them and not for them to be lost in an urban sprawl.

Ash Manor and its associated buildings are grade II listed (an application has been made to Historic England for an upgrade in listing) It is officially listed as a " Palace" and. Fortified Manor House with "Earthworks", owned by a Saxon Lord And several Kings of England, from Edward the Confessor and it was Edward II who lived in the Manor House and was responsible for digging the Moat, with Drawbridge, followed by Edward III, Richard II, Henry IV, Henry V, Henry VI, later Henry VIII and Edward VI. It's approaches and setting are significant and MUST be protected. This is our Heritage !

and the field north of Ash Green Road, not only has two Roman roads meeting, but it is the site of the original Ash Green from whence the village got its name. This field is ASH GREEN !

The roads in the immediate area are narrow country lanes with no footpaths, and cannot sustain increase of motor transport. The area is rural and cannot in anyway support an urban settlement.

I respectfully ask that the boundaries stay as they are and not to be played with just to suit requirements. It's impractical and immoral!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2582</th>
<th>Respondent: 17325537 / Teresa Hogan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Policy/Site Allocation A25 Gosden Hill

a. These is insufficient infrastructure to support the broader impact, such as traffic affecting the surrounding areas. The additional traffic will have to pass through Burpham which already suffers from congestion and grid-lock on a regular basis. There is insufficient provision to address the additional load of traffic. The negative impact on the health and welfare on Burpham residents is unacceptably high.

b. There appears to be only one access to the development. And additional access should be available and its location known in advance.

c. The requirement for the developer to have regard for the “Sustainable Movement Corridor Supplementary Planning Document” is effectively meaningless as the roads in Burpham are narrow and have bottlenecks. Does this mean the longerterm impact will be the removal of green verges or appropriating houses to widen the road? To meet the sustainability criteria, this should be addressed as part of the plan.

d. Gosden Hill is situation within the Green Belt and should remain as such; it is a national, not just a local asset.

More steps should be taken to protect the Green Belt, not just at Gosden Hill, but all the green belt surrounding Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1023  Respondent: 17325537 / Teresa Hogan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I recognise the urgency of a local plan for Guildford, however, I have concerns that the revised Draft Local Plan is unsound and unsustainable.

The proposal that only 60% of full time University students will accommodated on campus puts increased pressure on houses in the town. This should be closer to 80%, and thereby free up housing in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp172/2594</th>
<th>Respondent: 17325665 / Claire Nix</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A34</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to removal of Brownfield site (A34) from the Plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2595</th>
<th>Respondent: 17325665 / Claire Nix</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A34</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2599</th>
<th>Respondent: 17325665 / Claire Nix</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site.

It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The associated traffic increase from the RHS has not been taken into account. The regular events at the RHS attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the fact that the increased area, being on the south of the site facing the Surrey Hills Area of National Beauty will increase the negative impact of the views.

I object to the removal of additional 3.1 ha from the green belt without any justification

I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000s of objection from local residents and statutory consultees.

I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

I object to the extension of the plan period by 1 year as it has not been identified as a major change

I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly to reflect the views and concerns of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp172/2597  **Respondent:** 17325665 / Claire Nix  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/2587  **Respondent:** 17325665 / Claire Nix  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch
The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan. Furthermore A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots …” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm,… (site allocation A25) [ than the Burnt Common site did ]”

The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2589  Respondent: 17325665 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2591  Respondent: 17325665 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC do not appear to be following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2596</th>
<th>Respondent:</th>
<th>17325665 / Claire Nix</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1031</th>
<th>Respondent:</th>
<th>17325665 / Claire Nix</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object the change in policy on affordable homes (Policy 4.2.23). The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”. The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” This appears to remove the requirement for developers to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes which is scandalous, particularly in the light of the national concerns over social housing. Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit becomes an acceptable reason not to deliver affordable homes. The Council should be ensuring that it priorities the needs of its local community rather than providing incentives and support to developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1033  Respondent: 17325665 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1030  Respondent: 17325665 / Claire Nix  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the extended development in the Green Belt (Policy P2, Site A43). The Green belt offers a number of benefits for both urban and rural population and was designed to protect that land for the foreseeable future. The policy of protecting green space near towns and cities has a big impact on the shape and nature of the places we live in and the protection should not be taken away. By preventing urban sprawl, we preserve the character of our rural communities and historic towns and villages and prevent towns from merging into one another. There is also an argument that removing land from the Green Belt and allowing developers to build on this land you do not achieve proper development of run down or derelict land. (consider the removal of A4 brownfield site from the Plan - see objection below Only 13% of England is currently green belt so to erode this small percentage is dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1032  Respondent: 17325665 / Claire Nix  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1046  Respondent: 17327265 / Linda Ross  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford BC has still not justified the huge number of houses they wish to build. Their projected need for housing exceeds even the Government's figures and I can find no reason in this plan why this is so.

Many Authorities have downsized their building plans in order to protect the Green Belt. Guildford BC has chosen to do the opposite and I strongly object to local villages being inset from the Green Belt.
Guildford BC still has given no idea of their plans for the increase in road capacity to handle the enormous increase in local traffic their plans would cause. Nor have they indicated any plans for dealing with the most basic of needs that of handling domestic sewage, despite the Water Authority indicating that the current plant based in Ripley will not handle any large increase. Their plans simply note vague notes about "to include schools and medical facilities" but where these might be is not made clear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2621  Respondent: 17327329 / Adrian Wise  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As well as the general points above and notwithstanding any ruling upon them I also object to the inclusion of TFM in the draft local plan - even or especially as it is now amended and even if the further amendments now proposed by the developer can be considered at this stage. My reasons include:

1. TFM is the least sustainable strategic site identified in both this and previous versions of the plan because of the constraints on the site and the physical location.
2. TFM is further from railway stations than any other possible strategic site – hardly a place to locate students or other residents of publically owned or rent subsidised homes.
3. TFM relies upon the most congested stretch of the strategic road network in the county and the most congested motorway junction in the country (J10).
4. All roads local to TFM are at capacity and there are no funds to expand these e.g. by providing new bypasses.
5. The proposal to provide a bus service to TFM is totally unrealistic and unsafe. The roads are inadequate etc. This is clearly a sop to try and get permission - the bus will never materialise or will be cancelled for low use soon after its inception.
6. TFM is next to the most popular visitor attraction in the south-east, the RHS at Wisley, where visitor numbers are booming. These are forecast to increase by over 500,000/annum in the planning period yet this has not been taken into account. The RHS’s very popular special events attract thousands more visitors several times a year and these already bring the traffic all around to a standstill. Any future residents of TFM would be virtually prisoners.
7. There is no employment available near TFM so its residents will have to commute to work (or to the university to study!).
8. The proposed development at TFM cannot be built in any event or at least for many more than five years as a) it would breach the height restrictions imposed by the Ockham DVOR/DME (that will remain throughout the plan period) and b) there is no sewerage capacity. Ergo this site anyway cannot contribute to any five year land supply calculation.
9. Even the councils own (changed) “Opportunities” listed in their policy reinforce why TFM is totally inappropriate. It takes barely a fleeting look at the plans for this site (a very long urban terrace perched on top of a ridge) to see these are just totally wrong.
10. The TFM site as this now defined (3.1Ha larger than was the subject of a recent planning application that the council unanimously rejected!) a) now abuts another heritage asset, Upton Farm, negatively impacting the setting of this building, b) will greatly damage the Surrey Hills AONB by its disfiguring views, c) encloses an area of high archaeological impact and d) proposes building on the flood plain. The site plans do not even accurately show the proposed site boundaries.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1049</th>
<th>Respondent:</th>
<th>17327329 / Adrian Wise</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

After the previous draft of this plan the government issued a housing white paper (HWP) clarifying that green belt areas must be more strongly protected. This matter was alerted to the council by myself (and doubtless others). Unfortunately however the council decided to disregard this white paper (as it boasted to a public broadcast meeting) and has issued this revised draft. This amended draft indeed does ignore the HWP, which makes it inevitable that the plan will be declared unsound at review as GBC must be considered to have ignored this ‘material consideration’.

Furthermore as the government has said it will provide further guidance on the matter of setting ‘Objective Assessment’s of Need’ this Autumn and as such the timing of this exercise is completely dumbfounding.

In particular the HWP directed the council to plan for the maximum use of higher density urban development, brownfield regeneration and transport hub integration and to make all efforts to exhaust these options before considering others. The council has done none of these things – au contraire it seems to have done the opposite. As a starting point the council must finally make an up to date inventory of its housing stock and the likely availability of windfall, brownfield, transport and urban development sites, and apply maximised development density assumptions, before it can make a valid plan. The council in having done none of these things is failing in its duty.

Rather than properly examining the potential of town centres the council in this plan has decreed that the ‘tide cannot come in’. It has ignored the impact of the Internet and even allocated town centre space for additional retailing. Rather than face the prospect of boarded up shops this space would be much better used for residential development. The footfall this would generate may even ‘save’ these town centres. To confirm this ‘Canute’ fear the Carter Jonas study update 2017 from which the plan was developed even includes “demand” for retail space from companies already in administration!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1050</th>
<th>Respondent:</th>
<th>17327329 / Adrian Wise</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Council has singularly failed to state what it considers its objective need to be, issuing only a relative ‘net new dwelling’ number with no reference point which is therefore entirely meaningless. As this plan is not due to take effect until 2019/20 it cannot be the case that the same number of new dwellings will be required no matter how many there are now and no matter how many are built in the meantime – this would be nonsense!

Therefore the council’s proposed housing number is unsound and will be subject to a successful legal challenge.

According to the DFLG housing projections, based on ONS population and housing formation projections, extrapolated from the prior five years of data, the number of dwellings required in the Borough by April 2034 (i.e. the time period that the plan is to cover) is 65,859 – this was the starting point used by the council to inform its plan creation.

According to the last census, and adding completion and plan forecasts through 2019/20 when this plan is to come into effect, the total number of houses in the Borough by then will be at least 59,000. This leaves only less than 7,000 still to be built (from now until April 2034 i.e. 17 years i.e. about 411/year, far fewer than are being built now) – a number well within the five year land supply with no need to reclassify any green belt.

The council has put forward some arguments as to why it thinks a higher figure than 65,859 should be planned for. These are:

1. Higher student numbers – but student numbers are declining, foreign students are shunning Britain post Brexit (and we may well restrict them thereafter anyway) and there are no funds to expand the universities – the opposite is true. Even if student number growth were intended, which it is not, how anyway would a plan to build family homes far away from the university help this growth? This plan should go back into the melting pot.
2. Lower average house prices. It is claimed that somehow building a few more ‘market’ houses worth far more than the average house price will reduce the average. Simple maths shows the opposite would happen. To even claim an average price reduction because of over building houses worth more than the average is ‘fake news’. The most recent data for the South-East shows house prices anyway dropping rapidly toward the national average – the effects of Brexit (loss of confidence and exchange rate inflation squeezing real incomes), changes to stamp duty, ‘enveloped property tax’, etc. are cited as reasons why.
3. Contingency – why on earth ‘plan’ to exceed the plan, surely a plan is a plan.
4. After these three obviously wrong-headed adjustments the draft local plan then calls for 12,426 ‘net new homes’ (as stated with no reference point this target is meaningless – new added to what?). Using the councils’ own arithmetic however is ‘net new’ figure should be 9,810 not 12,426 – a glaring error.

I counter that Guildford should evidently be planning for far fewer than 65,859:

1. Net international migration, which the ONS says drove 80% of its most recent household formation projection, is way down post Brexit (this has led to a dramatic fall in net EU immigration, down 80% in the most recent quarter).
2. A five year view used by the council (via the DFLG projections) is the wrong ONS data to base its need assessment upon. The GLA for example bases its assessment on a 10 year view – which for Guildford would reduce its need below 60,000. As the GLA correctly points out using five years of data to extrapolate would mean undue emphasis would be given to the new EU entrant immigration ‘bubble’ of the late nineties. Hence they used a 10 year view in order to somewhat smooth out this bubble. All forecasters know it is important to eliminate outliers from their forecasts.
3. The Council has anyway not, as they are required to do, made any allowances for their ‘constraints’ such as the huge amount of green belt in their stewardship, lack of transport and other infrastructure, heritage assets, the flood plain within its area, air quality, AONB, TBHSPA, etc. With all these matters considered the OAN for Guildford for 2033/34 would be well under 60000 and there would be no issue in achieving this. Indeed the crying need for the Borough is how to limit the over provision of market housing – and the local plan is silent on this crucial subject. Any homes to be built should be ‘affordable’, but note well that the NPPF definition of this term is dwellings owned by the council or its housing associations (etc.) and/or with rents at least 20% subsidised by the council. There is no funding for either of these categories. [NB it is incredibly insulting to call market houses that will sell for many £100,000 ‘affordable’ as the council does in its draft plan – these are just slightly cheaper market houses.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/784</th>
<th>Respondent: 17328609 / Mike Dean</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Removal of sites A46 and A47 – I support the removal of these two sites from the plan. This is Green Belt land and in any event the local infrastructure in terms of roads, sewage, flooding and other utilities cannot possibly cope with this development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1064</th>
<th>Respondent: 17328609 / Mike Dean</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10,000 homes within a 10 mile radius of Normandy I remain concerned about this proposal as in no way can the infrastructure in the area cope. If this really is to proceed then GBC must commit to putting in the infrastructure to support it.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1063</th>
<th>Respondent: 17328609 / Mike Dean</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages & Palm House nurseries traveller site. I object to this proposal. Placing these homes outside of the Green Belt could enable development within these areas at much higher density and could lead to greater success for planning applications. This is a wrong decision as these areas contribute to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1075</th>
<th>Respondent: 17328705 / Aviva Investors (Helen Rainsford)</th>
<th>Agent: Q+A Planning Ltd (Peter Keenan)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre. Policy D4 has been significantly changed and concerns the character and design of new development. This includes a series of detailed design requirements and presumably is intended to replace, at least in part, the previous requirements concerning density in Policy H1. We have objected to Policy H1 to the removal of sensible support for high density residential developments in Guildford town centre. This sentiment has not been replaced in Policy D4.

The only response to density in the Plan concerns an open-ended requirement at criterion (d) of Policy D2 that seeks to ensure appropriate density to make the most efficient use of the land whilst responding to local character and context. Whilst as a concept, this is sensible, this gives little guidance on local circumstances or the general starting point on for density, particularly in the residential sector. Consistent with our comments on Policy H1, this is inconsistent with the requirements of local authorities in paragraph 47 of the NPPF to ‘set out their own approach to housing density to reflect local circumstances’.

It is requested that the overarching support for high density residential development in Guildford town centre ought to be re-introduced, since this properly responds to local circumstances and reflects the aim to deliver more housing in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See comments above

Attached documents:
Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre.

Policy E7 concerns Guildford town centre. The quantitative need for retail floorspace in the comparison sector has reduced for the town centre from 45,000 sqm gross to 41,000 sqm gross to 2034. It should be noted that the figure relates to 2030 rather than 2034, as set out in paragraph 4.4.79.

We have no comment on the reason for the reduction in floorspace. However, the reduction in the quantitative floorspace need available and the way the policy is worded suggests that this should all go to the North Street regeneration site. However, we do not believe this is the intention as paragraph 4.4.81 only refers to the ‘vast majority of the retail floorspace’. Therefore, this should be clarified.

The need for additional retail floorspace is driven by total growth apportioned to the town centre, once deductions for special forms of trading, improved efficiencies and commitments are taken into account. Therefore, in circumstances where the whole of the town centre could have a claim on this growth, the policy should be sufficiently flexible to enable other sites to meet some of these needs through redevelopments, reconfigurations, minor alterations of extensions.

Therefore, we consider the policy does not reflect the requirement of paragraph 23 of the NPPF (sixth bullet) that requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail (and residential) development in town centres.

It is also noted that the distribution of homes to the town centre is increased from 1,172 to ‘approximately 1,300 new homes, particularly on upper floors as part of mixed use developments’. Consistent with the amendments to the Vision (which we have commented upon separately), this should be a minimum rather than an approximate figure.

The ninth bullet point of paragraph 23 of the NPPF makes it clear that local authorities recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites. Given the increase in the amount of residential development expected in the town centre, we do not consider that Policy E7 is sufficiently strong on its encouragement for appropriately located residential schemes within the town centre and suggest explicit support is given to this aim.
Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre.

A change is proposed that deletes the section of this policy on density, and we object to the proposed deletion of the policy presumption that ‘high density development will be supported in Guildford town centre’. It is assumed that this section of the policy was removed due to the expanded detail in Policy D4 (which we comment on separately), but the clear policy direction has not been replicated in Policy D4.

In our view, including a presumption supporting high density residential development in town centres is entirely logical, since it enables the best use of previously developed land and helps cement sustainable development, with the convenient access to transport, shops and services development within the town centre will bring. Deleting this element waters down the policy for residential development.

In our view, this omission avoids the requirement for local authorities in paragraph 47 to ‘set out their own approach to housing density to reflect local circumstances’. A starting point for high density residential development in Guildford town centre would reflect local circumstances as a large town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The support for high density residential development in Guildford town centre should be reintroduced.

Attached documents:

**Comment ID:** pslp171/1068  **Respondent:** 17328705 / Aviva Investors (Helen Rainsford)  **Agent:** Q+A Planning Ltd (Peter Keenan)

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre.

It is noted that the Plan’s spatial vision includes a lower requirement of homes of ‘at least 12,426 homes by 2034’. The reduction in the total requirement qualified by the change that makes it clear that the total number of homes is a minimum. However, the vision is not consistent when addressing where these homes will be located, with the use of the terms ‘approximately’ and ‘at least’ used interchangeably when considering the distribution of homes.

The NPPF makes it clear that the planning system needs to provide the supply of homes required to meet the needs of present and future generations (paragraph 7). Paragraph 47 of the NPPF also makes it clear that local planning should boost significantly the supply of housing.
Whilst we advocate the minimum housing requirement set out in the plan, we object to the use of approximately in respect of the distribution of homes, particularly the ‘approximately 3,000’ that will be located in urban areas, which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car. This figure has changed from ‘over 2,800’ to approximately 3,000.

To support the Government’s housing agenda, there needs to be a recognition in the Council’s vision that the scale of housing in urban areas should not be artificially capped, given the sustainability advantages of located new houses in urban areas. Therefore, on this basis, we suggest that the terminology is amended to revert to the sentiment that ‘at least’ 3,000 homes will be located in urban areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

The terminology should be revised to consistently refer to 'at least' when considering the distribution of homes as well as the total requirement.

**Attached documents:**
Q+A Planning Ltd act on behalf Aviva Investors in respect of White Lion Walk shopping centre in Guildford town centre.

In the sites section of the Plan, 11 sites are allocated with Site A4 at the Telephone Exchange deleted. Of these sites, seven include housing. The total gross number of housing units for these sites over the plan period is 1,285, representing an increase from 1,135 from the previous version of the plan, representing an uplift of 150. It is noted that the allocation for the North Street site has increased 100% from 200 to 400.

Over half of the units allocated for the town centre (750) are expected to come forward on two large sites; namely North Street and at the Station. The proposals at North Street have been in the pipeline for approximately 15 years, with numerous false starts. It is appreciated that the Council have an exclusivity arrangement with the owners of the Friary Centre to attempt to agree commercial terms. However, as far as we are aware, these discussions have not yet concluded. Therefore, the timetable of this scheme remains uncertain.

In respect of the Station, planning application for a mix of uses to include 438 dwellings has been refused by the Council and is due to be heard at an appeal in November 2017. Therefore, there is some doubt over the timescales and the scale of housing that can be delivered on this site.

The Council is faced with a substantial need – both retail and residential – that the NPPF explains in paragraph 23 should be met in full and that local planning authorities should allocate a range of suitable sites. Therefore, we consider there is justification from the evidence before the Council to include a further allocated site to help meet these needs and provide choice to the market, consistent with the NPPF.

Therefore, Aviva Investors wish to put forward White Lion Walk shopping centre as a proposed allocation in the Plan for a mix of retail, leisure and residential uses. Aviva have only recently acquired the asset and therefore were not able to put forward the site for development in previous consultations or call for sites exercises. However, given that the Council have sought to increase the total number of dwellings in the town centre compared to the previous version of the Plan, and given the uncertainty surrounding the main two residential sites in the town centre, we consider there is robust justification to include White Lion Walk shopping centre as an allocation for retail (recognising it is already in retail use), residential and potentially leisure (in the food and beverage sector).

Whilst the shopping centre is occupied, the existing configuration is not fit for purpose when considering retailer requirements and macro-economic trends in the retail sector. Therefore, at this stage, our client is considering feasibility of different options for the site. However, the eventual outcome it is likely to include a reconfiguration of the existing retail floorspace to provide new floorplates meeting market demand, potentially with some supporting food and beverage uses and residential space on upper floors. The scheme has the potential to deliver up to 100 dwellings on the upper floors, subject to feasibility testing and design considerations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

While Lion Walk shopping centre should be allocated for a mix use development opportunity

Attached documents:
Comment ID: pslp172/2634  Respondent: 17328801 / Adriana Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 Clockbarn Nursery, Tannery Lane

The proposed allocation for 45 homes in the previous draft plan on green belt land was objected to & I object to this revision which now proposes a 33% increase to 60 homes. Tannery Lane is unsuitable for the quantity of traffic which would be generated, as is the junction with the A247, and there are no exceptional circumstances to warrant development on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2635  Respondent: 17328801 / Adriana Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 Garlick's Arch, Send Marsh

I object to the proposed allocation for 400 homes and 6 travelling show people plots. There are no exceptional circumstances to warrant development on the green belt. There is insufficient services infrastructure for housing and show people plots, nor any justification for concentrating 6 of the proposed 8 borough-wide show people plots within Send. The road network is insufficient for housing development on this scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2636  Respondent: 17328801 / Adriana Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A58 land at Burnt Common, London Rd

I object to a new allocation of 7,000 sq m of industrial or warehousing which was deleted from the 2015 draft. I also object to the wording of the allocation: the 2016 "maximum" allocation of 7,000 sq m has now been changed to "minimum". There is a surplus of industrial premises in the borough and the requirement for further industrial/warehousing has not been proven. The road infrastructure is inadequate and there are no exceptional circumstances to warrant development on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1067  Respondent: 17328801 / Adriana Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 2 paragraph 4.3.15 green belt.

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2637  Respondent: 17329025 / Andrew Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn Nursery Tannery Lane, Send, because:

1. a) There is an increase of 33% in the number of homes from 45 to 60. This is far too many for this rural area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to Policy A42 change at Clockbarn Nursery Tannery Lane, Send, because:

- a) There is an increase of 33% in the number of homes from 45 to 60. This is far too many for this rural area.
- b) The traffic along Tannery Lane and at the junction to the A247 (Send Road) is already very busy during rush hour. The increase in houses and therefore traffic will make it intolerable.
- c) Severe water surface flooding will be made even worse.
- d) It will have a greater impact on the countryside views from the River Wey.
- e) Hundreds of previous objections from local people seem to have been ignored.

Attached documents:

Comment ID: pslp172/2639  Respondent: 17329025 / Andrew Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 Change at Garlick’s Arch because:

1. a) It ignores all the thousands of previous objections made by local people.
1. b) It will generate excessive traffic that will block the local roads in Send and Ripley.
1. c) There is no proven demand for Travelling Showpeople plots on this location.
1. d) It will cause over development of our village and the number of homes is excessive.
1. e) It is a beautiful permanent Green Belt and no "exceptional circumstances" exist.
1. f) It will join Ripley up with Send and defeat the object of the Green Belt.
1. g) It is an exquisite ancient woodland that existed in the time of Elizabeth 1.
1. h) It is subject to frequent flooding and is currently in a flood zone 2 allocation.
1. i) The land has been contaminated by lead shot for over fifty years

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2638  Respondent: 17329025 / Andrew Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 Land at Burnt Common Send because:

1. a) It had been deleted from the 2014 draft There Local Plan because of all the objections previously made.

1. b) There are empty sites and industrial units at Slyfield and Guildford therefore there is no need to build warehouse or industrial development in the middle of the green belt.

1. c) The impact on the small surrounding roads will be intolerable and create traffic gridlock. It is like this most of the time anyway especially if there are problems on the A3 or M25.

1. d) The employment land Need Assessment (2017) shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares in Send on the Green Belt.

1. e) The word "minimum" is a change from the previous "maximum" in the 2016 plan and since then there has been a decline in demand for industrial land.

1. f) This over development will join up existing villages and defeat the object of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1069  Respondent: 17329025 / Andrew Hollis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from the Green Belt because:

1. a) There is highly restricted vehicular access along Tannery Lane in both directions. The lane is very busy at peak times and will become worse.

1. b) Further expansion or development at this location detracts from the openness of the Green Belt and is totally inappropriate.

1. c) It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation canal and the Wey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2642  Respondent: 17329217 / Karis Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 Clockbarn Nursery, Tannery Lane

The proposed allocation for 45 homes in the previous draft plan on green belt land was objected to & I object to this revision which now proposes a 33% increase to 60 homes. Tannery Lane is unsuitable for the quantity of traffic which would be generated, as is the junction with the A247, and there are no exceptional circumstances to warrant development on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2641  Respondent: 17329217 / Karis Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A43 Garlick's Arch, Send Marsh

I object to the proposed allocation for 400 homes and 6 travelling show people plots. There are no exceptional circumstances to warrant development on the green belt. There is insufficient services infrastructure for housing and show people plots, nor any justification for concentrating 6 of the proposed 8 borough-wide show people plots within Send. The road network is insufficient for housing development on this scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2640  Respondent: 17329217 / Karis Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58 land at Burnt Common, London Rd

I object to a new allocation of 7,000 sq m of industrial or warehousing which was deleted from the 2015 draft. I also object to the wording of the allocation: the 2016 "maximum" allocation of 7,000 sq m has now been changed to "minimum". There is a surplus of industrial premises in the borough and the requirement for further industrial/warehousing has not been proven. The road infrastructure is inadequate and there are no exceptional circumstances to warrant development on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1074  Respondent: 17329217 / Karis Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 2 paragraph 4.3.15 green belt.

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the Policy A42 change at Clockbarn Nursery in Tannery Lane

The addition of a further 15 residential units to a total of 60 units with the consequent increase in traffic in Tannery Lane and the A247 junction.

The effect on the local schools and Doctor's surgery.

The destruction of the Green Belt by this development.

The increase in surface water flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the Policy A43 change at Garlick's Arch I have been unable to find any justification in the Plan that requires the inclusion of a site for Travelling Showmen in this area. Travelling Showmen, by the very nature of their business TRAVEL. Is this site inclusion at Garlick's Arch for their winter quarters? We are all aware “when the fair comes to town” of the size and nature of showmen's vehicles and equipment and the long running of diesel generators with consequent atmospheric pollution. Yet again the wanton destruction of Green Belt and historic woodland. The increase of some likely 800 additional vehicle movements, on the naïve assumption of one car per household, in the immediate area to schools, doctor's surgery and supermarkets and workplaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A58 at Burnt Common
Guildford Council have seen fit to increase industrial development on this land by increasing the MAXIMUM developable area referred to in the 2016 Plan to a MINIMUM area of 7000sq. m. in this Plan.
The Employment Land Need identifies a REDUCTION of need to 3.9 hectares across the whole Borough so how can the increase of at least 7 hectares, at one location, be justified?
Why not develop existing industrial land much of which is in Council ownership.
No reference has been made in the Plan to the increase of atmospheric pollution from diesel engined Heavy Goods Vehicles.
The Burnt Common roundabout is already congested by vehicles of all types. "leapfrogging" the congestion on the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

GREEN BELT Policy 2 paragraph 4.3.15
I OBJECT to the proposal to inset Send Business Park from the Green Belt.
This non-conforming user occupies a site surrounded by countryside and the River Wey.
Expansion of this industrial site will be detrimental to the open nature of the surrounding Green Belt.
Finally, I repeat that I am at a loss to understand why Guildford Borough Council has totally ignored objections made by Send residents during the 2016 Plan Public Consultation and why Send, and its immediate area, has been targeted as an area "ripe for development".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The traffic measurement figures for the Ash and Tongham proposals do not reflect the day to day traffic levels for the roads during the morning and evening peak, in light of recent changes by Rushmoor borough Council to traffic signals in Aldershot

[text of attachment reproduced below]

The Addendum to Guildford Borough Proposed Submission Local Plan “June 2016” Strategic Highway Assessment Report, states that conclusions of the SHAR 2016 is that:

“The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62), and that,

“Nevertheless, the results of this assessment indicate that should the RIS schemes not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe”

Certainly for the proposed developments in and around ash, in particular the Ash Lodge Drive development will have a significant impact on already saturated road network.

Recent changes to traffic signal timings and synchronisation in Rushmoor borough at the junction of North Lane and Ash Road has had a serious impact of traffic movements and journey times to the east of the borough boundary with traffic during morning and evening peak periods impacting Ash Street, the A331 and all of the local road network around Tongham, Ash and the A31/A331 junctions.

Traffic figures provided in the consultation documents are woefully inadequate and one has to question their validity, how they have been derived and the period during which they were obtained. On the 27th June, for less that 24 hours, a series of traffic monitoring cameras were deployed in and around Tongham, the A31 and the Manor Road / Ash Street junction (Greyhound Roundabout). The purpose of the cameras was not clear (Turning movements, origin / destination journey information, traffic counts etc.) however, what benefit could be derived from any data which is gathered in a period of less than 24 hours. Also, many of the senior pupils at Ash Manor school would not have been at school as this is during the exam period. any results from these video surveys will be worthless and of no value.

It is the case every day that the schools are open that traffic along Ash Street, Manor Road, Shawfield Road and Aldershot Road are brought to a complete standstill due to the volume of traffic. This is primarily due in the morning to parents taking children to school, as parking facilities at the local schools are non-existent. Additional homes in this area will only increase this burden on the local roads even with the developers contribution as the required infrastructure and services need to be overhauled, root and branch and minimal developer contribution will not address the real needs; they are merely a gesture.

| Policy A29: Land to the south and east of Ash and Tongham Capacity of the site has been increased from 1,200 to 1,750 homes. | No major impact on traffic impacts from those reported in the SHAR 2016. | The overall scale of growth in this strategic location for development has remained consistent but the capacity of the allocation for this site policy has been increased from 1,200 to 1,750 homes. The site policy now includes the various planning permissions in this area that have not yet commenced. There are no implications for the SHAR 2016 of this change. |
With regards the additional 550 homes in this policy A29, how is the impact on the highways being mitigated? Detail is lacking and to what improvements are being proposed and how the benefits of any improvements have been forecast and measured.

How is it that land has cannot be removed from the Green Belt in other areas of the borough to meet housing needs. Why are locations such Clandon, Ripley, Bramley and Shackleford not sites designated for development. They have much better access to the Strategic Road Network. Is it because GBC wish to move the developments as far as possible away from the showcase of their prized town centre and hope that the residents of those new developments will work and shop across the border in Hampshire? It strikes me that the Borough Council is Cherry Picking those areas which shall and shall not be removed from Green Belt protection based upon the class of the residents, their likelihood of complaining and the desire for the borough to remain a certain political hue.

Policy P3: Countryside

4.3.29 Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, countryside to the south and east of the urban area is allocated as a strategic location for development.

How has the sustainability of such large developments been calculated? The area is barely sustainable at the moment. What mitigations are proposed to improve an already poor level of sustainability and deliver improvements not only for the existing population of the area but for those who seek to move in to the new development.

What liaison has GBC had with Rushmoor BC to ensure that the overall developments of the two authorities do not destroy the environment and irreparably ruin an already difficult way of life for countless residents?

Local Plan, Page 212, Item 6. Why have the residents of Ash Green Road now been lumped in with Ash and Tongham. This seems ridiculous and only serves not only to upset and annoy the local residents, but also to put the borough planners in a poor light (not that it is looking to good so far).

The proposal for the bridges at Ash Level Crossing has been badly thought through. It is as if the BC is trying to make journeys through the area as difficult as possible to ensure travelers avoid the area. This is not always the case and people will have to life with this poor decision forever.

Local Plan, Page 330. What about Ash Walsh Schools. They are closer to the Ash Lodge Drive development and places here are in greater demand than Ash Grange. This needs a serious rethink.

Local Plan, Page 333. If Ash Manor school is to be expanded, serious improvements need to be made to the road infrastructure throughout Tongham, Ash and Ash Green. The values quoted in the report for developer contribution will, in no way, be enough to accommodate the expansion at these schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/2654  Respondent:  17335905 / Anthony Drapper  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see the attached document for the concerns raised. They cover a range of issues which need to be addressed and some of the information in the local plan is based, I believe, on flawed data.

[text of attachment reproduced below]

The Addendum to Guildford Borough Proposed Submission Local Plan “June 2016” Strategic Highway Assessment Report, states that conclusions of the SHAR 2016 is that:

“The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network” (p.62), and that,

“Nevertheless, the results of this assessment indicate that should the RIS schemes not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe”

Certainly for the proposed developments in and around ash, in particular the Ash Lodge Drive development will have a significant impact on already saturated road network.

Recent changes to traffic signal timings and synchronisation in Rushmoor borough at the junction of North Lane and Ash Road has had a serious impact of traffic movements and journey times to the east of the borough boundary with traffic during morning and evening peak periods impacting Ash Street, the A331 and all of the local road network around Tongham, Ash and the A31/A331 junctions.

Traffic figures provided in the consultation documents are woefully inadequate and one has to question their validity, how they have been derived and the period during which they were obtained. on the 27th June, for less that 24 hours, a series of traffic monitoring cameras were deployed in and around Tongham, the A31 and the Manor Road / Ash Street junction (Greyhound Roundabout). The purpose of the cameras was not clear (Turning movements, origin / destination journey information, traffic counts etc.) however, what benefit could be derived from any data which is gathered in a period of less than 24 hours. Also, many of the senior pupils at Ash Manor school would not have been at school as this is during the exam period. any results from these video surveys will be worthless and of no value.

It is the case every day that the schools are open that traffic along Ash Street, Manor Road, Shawfield Road and Aldershot Road are brought to a complete standstill due to the volume of traffic. This is primarily due in the morning to parents taking children to school, as parking facilities at the local schools are non-existent. Additional homes in this area will only increase this burden on the local roads even with the developers contribution as the required infrastructure and services need to be overhauled, root and branch and minimal developer contribution will not address the real needs; they are merely a gesture.

| Policy A29: Land to the south and east of Ash and Tongham | Capacity of the site has been increased from 1,200 to 1,750 homes. | No major impact on traffic impacts from those reported in the SHAR 2016. | The overall scale of growth in this strategic location for development has remained consistent but the capacity of the allocation for this site policy has been increased from 1,200 to 1,750 homes. The site policy now includes the various planning permissions in this area that have not yet commenced. There are no implications for the SHAR 2016 of this change. |

Page 2510 of 2988
With regards the additional 550 homes in this policy A29, how is the impact on the highways being mitigated? Detail is lacking and to what improvements are being proposed and how the benefits of any improvements have been forecast and measured.

How is it that land has cannot be removed from the Green Belt in other areas of the borough to meet housing needs. Why are locations such Clandon, Ripley, Bramley and Shackleford not sites designated for development. They have much better access to the Strategic Road Network. Is it because GBC wish to move the developments as far as possible away from the showcase of their prized town centre and hope that the residents of those new developments will work and shop across the border in Hampshire? It strikes me that the Borough Council is Cherry Picking those areas which shall and shall not be removed from Green Belt protection based upon the class of the residents, their likelihood of complaining and the desire for the borough to remain a certain political hue.

Policy P3: Countryside

4.3.29 Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, countryside to the south and east of the urban area is allocated as a strategic location for development.

How has the sustainability of such large developments been calculated? The area is barely sustainable at the moment. What mitigations are proposed to improve an already poor level of sustainability and deliver improvements not only for the existing population of the area but for those who seek to move in to the new development.

What liaison has GBC had with Rushmoor BC to ensure that the overall developments of the two authorities do not destroy the environment and irreparably ruin an already difficult way of life for countless residents?

Local Plan, Page 212, Item 6. Why have the residents of Ash Green Road now been lumped in with Ash and Tongham. This seems ridiculous and only serves not only to upset and annoy the local residents, but also to put the borough planners in a poor light (not that it is looking to good so far).

The proposal for the bridges at Ash Level Crossing has been badly thought through. It is as if the BC is trying to make journeys through the area as difficult as possible to ensure travelers avoid the area. This is not always the case and people will have to life with this poor decision forever.

Local Plan, Page 330, What about Ash Walsh Schools. They are closer to the Ash Lodge Drive development and places here are in greater demand than Ash Grange. This needs a serious rethink.

Local Plan, Page 333. If Ash Manor school is to be expanded, serious improvements need to be made to the road infrastructure throughout Tongham, Ash and Ash Green. The values quoted in the report for developer contribution will, in no way, be enough to accommodate the expansion at these schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Further, more detailed analysis need to be done regarding existing traffic and travel related issues as the current situation is not sustainable even before developments take place.

Attached documents:  Guildford Borough Local Plan.docx (149 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We fully support the removal of A46 and A47 from the site list. It is clear that the current infrastructure would be unable to cope with developments of this magnitude, especially the roads, flooding and power cut frequency and the already burdened health system. Also important to highlight that both sites are Green Belt and for A47 specifically, has SNCI status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We fully support the removal of A46 and A47 from the site list. It is clear that the current infrastructure would be unable to cope with developments of this magnitude, especially the roads, flooding and power cut frequency and the already burdened health system. Also important to highlight that both sites are Green Belt and for A47 specifically, has SNCI status.

Attached documents:

Comment ID: pslp172/2662  Respondent: 17337249 / Ben Aaronson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wholly agree with the decision to remove site A46.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2663  Respondent: 17337249 / Ben Aaronson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wholly agree with the decision to remove site A47.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4906  Respondent: 17337569 / Carol Wincott  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3240  Respondent: 17339041 / Carol Pedley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- 2. Policy A29: Land to the south and east of Ash and Tongham
  
  I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.
• “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond.

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows: “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

  1. The Street in Tongham
  2. A331/A323 intersection
  3. A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond.

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows: “Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:
• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

• 4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

• 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

• Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: pslp172/3836  Respondent: 17339649 / Karen Heane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help
soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

**Attached documents:**

---

**Comment ID:** pslp171/1956  **Respondent:** 17339649 / Karen Heane  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:

Comment ID: pslp171/1146  Respondent: 17340033 / Guildford Private Renters Association (Nicholas Bragger)
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

‘Policy H2: Affordable Homes’ - should change back to mandating social housing. Point 4 of it should be removed, affordable housing should be included in the main site, as it creates a better society when social housing is not separated from other developments.

Affordable housing definition in the appendix - includes social housing but makes no distinction of percentages. 40% affordable housing is mandated and at least 20% of it should be social housing. 10% should be dedicated to being
Community Land Trust housing and/or certain smaller developments should be handed to a local group to create a Community Land Trust. We feel that there are not enough truly affordable housing options being considered, and Community Land Trusts, amongst other options, should be mandated. In addition social housing should be clearly defined as ‘secure tenancies’.

Overall, we find the definition of affordable housing very vague, and makes it too easy for developers to make excuses for not providing affordable housing. In addition, truly affordable housing possibilities (such as Community Land Trusts) are not considered or mentioned, which is currently a disappointing missed opportunity.

Attached documents:

Comment ID: pslp171/1147  Respondent: 17340033 / Guildford Private Renters Association (Nicholas Bragger)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H1 Homes for all: - For student accommodation we support purpose-built accommodation. The key thing is that student accommodation needs to be expanded beyond the University of Surrey to include other academic institutions such as Merrist Wood College, ACM, Drama School and the University of Law. We need to keep it fixed at 60% provided accommodation, whereas currently it sounds vague.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

H1 Homes for all: - For student accommodation we support purpose-built accommodation. The key thing is that student accommodation needs to be expanded beyond the University of Surrey to include other academic institutions such as Merrist Wood College, ACM, Drama School and the University of Law. We need to keep it fixed at 60% provided accommodation, whereas currently it sounds vague.

Attached documents:

Comment ID: pslp171/1148  Respondent: 17340033 / Guildford Private Renters Association (Nicholas Bragger)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4.2.40 – the deleted section should be re-instated. Community benefits are not an excuse to avoid affordable housing, and does more damage to Guildford's community by segregating people.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

4.2.40 – the deleted section should be re-instated. Community benefits are not an excuse to avoid affordable housing, and does more damage to Guildford's community by segregating people.

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2680</th>
<th>Respondent:</th>
<th>17340193 / Surya Hotels (S Dulai)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent:</td>
<td></td>
<td></td>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( No )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The Council's latest AMR suggests a housing supply of a little over 2 years, which reflects a persistent failure to address the OAN. The calculation of 5YHLS takes account of sites identified in the SHLAA but which do not benefit from planning permission or an allocation. Site A36 is one of the sites that it is suggested could be drought forward within 5 years.

The site is available and could be developed for housing within 5 years.

The site is allocated for residential development in the submission draft of the East Horsley Neighbourhood Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

The site should be reinstated as a housing allocation in the Local Plan, in part to reflect the putative Neighbourhood Plan allocation.

**Attached documents:**

---

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3793</th>
<th>Respondent:</th>
<th>17340193 / Surya Hotels (S Dulai)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
<td>( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Lanpro Services are acting on behalf of Surya Hotels in relation to their Thatcher’s Hotel site in East Horsley, who have instructed Lanpro to review the current Guildford Borough Proposed Submission Local Plan: Strategy and Sites Consultation Document.

It is appreciated that Guildford Council are only seeking comments, at this stage, on the changes that it is proposing to make to the plan and on the new and updated evidence base. As such, these comments will focus on the proposed changes to The Horsleys – East Horsley (south) and Horsleys – East Horsley Proposals Maps. Lanpro are supportive of the changes made to the proposals maps.

The Thatcher’s Hotel, East Horsley

The Hotel extends to an area of approximately 1.6 hectares on the edge of the village of East Horsley.

The site is currently occupied by Thatcher’s Legacy Hotel with its associated car parking and landscaped areas. It is accessed from the A246 Epsom/Guildford Road which runs to the west and south of the site.

The topography of the site generally slopes gently upwards from north to south with a slightly steeper incline towards the southeast corner. Current site levels on the southern boundary are generally lower than those of the adjacent A246. There is well established natural vegetation around the site, particularly to the south and west along the perimeter boundary. The site does not contain any Public Rights of Way or bridleways.

The site in its entirety measures approximately 1.6 hectares. The footprint of the existing buildings cover an area of 0.24 hectares, which is approximately 14.5% of the overall site. Hard standing accounts for a further 0.39 hectares, which is approximately 24.5% of the total site are. The existing built form and hard standing combined cover 0.63 hectares, approximately 39% of the overall site.

The remainder of the site that is not occupied by the built form or development includes areas of grass, vegetation, signage, lighting and more formal garden seating areas closer to the building.

A part full, part outline application for the substantive demolition of the hotel buildings and change of use of the retained parts from hotel use (C1) to residential use (C3) (full application) and the erection of dwellings (outline application) to provide a total of up to 49 new dwellings was dismissed at Appeal on 9th February 2017 (Council Ref. 15/P/02354, PINS Ref. APP/Y3615/W/16/3158653).

The Horsleys – East Horsley (south) and Horsleys – East Horsley Proposals Maps

It is noted that the Local Plan proposes a number of changes to the proposals map, including:

- Removal of site allocation A36 (The Thatcher’s Hotel);
- Alterations to the Green Belt Boundary; and
- Alterations to the identified settlement boundary, to include the whole village settlement area.

Settlement Boundary

We support changes made to the identified settlement boundary, including removing East Horsley, particularly The Thatcher’s Hotel site, from the Green Belt. These changes will give clarity and certainty in supporting a wider range of uses regarding either the expansion or redevelopment of the existing hotel use, or the future redevelopment of the site.

Site Allocation A36

With regards to site allocation A36, it is noted that the Council’s principal reason for removing the hotel is due to, “insufficient evidence to demonstrate the loss of the hotel.” Following the refusal of the earlier scheme in 2017, the owners of the site are considering their next steps regarding the redevelopment of the hotel, which is likely to include providing further evidence to address the Inspector’s views on this issue. As such, it is possible that further evidence to justify the allocation could be available prior to the Examination In Public to support the redevelopment of the hotel.
Furthermore, it is noted that the most recent draft of the East Horsley Neighbourhood Plan, published 21st March 2017 (and after the Inspector’s decision), retains this site as an allocation for housing development (as Site 4). Policy H6 of the Neighbourhood Plan proposes an allocation of up to 22 dwellings, providing that the loss of the hotel facility must be appropriately justified in the planning application in accordance with the applicable local plan.

The changes proposed to the East Horsley Proposals Map does not identify a replacement allocation for the 22 dwellings proposed by The Thatcher’s Hotel site. As such, we would suggest that an alternative approach to this site could be to retain the allocation on the basis that it may facilitate the expansion/improvement/diversification of the hotel to make it viable as enabling development, or retain the allocation to enable the redevelopment of the hotel site, depending on the site only being developable when the Local Authority is satisfied that the loss of the hotel has been justified, following the further work being done to look at demand and supply of bed spaces and the overall short to medium term viability of the hotel.

**Development Proposal for The Thatcher’s Hotel**

As with the previously refused scheme, it is considered that the site can accommodate up to 49 dwellings.

Any proposed development would involve the demolition of the majority of the existing hotel and outbuildings, with the exception of the original Chown building, which could be retained and converted into private flats. 35% of the proposed dwellings would be provided as affordable.

Development of this site would comply with general NPPF policies relating to the use of brownfield sites, specifically paragraph 111 which states that, “planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed.”

**Summary**

Lanpro supports the alterations proposed to the settlement and Green Belt boundary as it would allow for the redevelopment of the hotel and its wider site. However, we would welcome the retention of the site allocation A36, to support the redevelopment and expansion of the hotel site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/1150  **Respondent:** 17340193 / Surya Hotels (S Dulai)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Part 3 of Policy E6 provides something of a catch-all approach to the protection of leisure and cultural facilities, including arts venues, entertainment venues, hotels and indoor sports venues. This approach fails to take account of the unique characteristics of the discrete uses that have been grouped together in the policy.

Hotels function across a wider geographical area than the Borough as is demonstrated by the Council's Evidence base. The Surrey Hotel Futures Report addresses the sector across the entire County and the need or otherwise for a hotel to be retained should be based on a similar analysis and not restricted to the geographical boundaries of the Borough.
The policy effectively requires that a replacement facility be provided in order to facilitate the loss or redevelopment of an existing hotel. However, this approach assumes that a duplicate facility is necessary and fails to take into consideration the existing provision across either the Borough or County. Where sufficient capacity exists, a replacement facility should not be required. The approach set out in the policy is not supported by the evidence base.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The policy should be amended as follows:

(3) The loss of existing visitor, leisure and cultural attractions, including arts and entertainment facilities, hotels and indoor sports venues, will be strongly resisted unless it can be demonstrated that sufficient alternative capacity of an equivalent or better standard is in place or could be provided. Alternatively, robust evidence must be provided that demonstrates that the facility causes significant detriment to the amenity of the locality or that:

(a) there is no longer a need for the existing facility or an alternative leisure or visitor use; and

(b) the existing use is unviable and its retention has been fully explored (including active and comprehensive through marketing the facility for its existing and alternative leisure or visitor use for a continued period of at least 18 months prior to submission of a planning application).

Attached documents:
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| The wording of Policy P2 does not reflect NPPF policy with regard to the forms of development that are not considered inappropriate in the green belt, specifically the redevelopment of brownfield sites. P2 should be amended to include the wording of para. 89, bullet 6 of the NPPF: |
| ‘limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.’ |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Policy P2 should be amended to include the wording of para. 89, bullet 6 of the NPPF: |
| ‘limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.’ |
| Attached documents: |

| Comment ID: pslp171/1927  Respondent: 17340193 / Surya Hotels (S Dulai)  Agent: Stuart Willsher |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| Policy S2 relates to the Council’s Spatial Development Strategy. It is noted that the wording of this policy has been amended to provide greater clarity regarding the overall housing requirement, as a total of 12,426 new homes during the plan period 2015-34. |
| The policy confirms that proposed allocations are shown on the corresponding proposals maps. As referenced above, the proposals map now proposes the removal of the Thatcher’s Hotel site (in contrast to the East Horsley Neighbourhood Plan). Given the ongoing viability concerns surrounding the hotel, it is considered that the site could make a contribution to the Council’s housing supply, as and when evidence is provided to support its redevelopment, and as such it is considered that its allocation could be retained. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: pslp171/3510  Respondent: 17340577 / William Wheeler  Agent: |
The changes to the plan have created even more contradictions to what it hopes to achieve and what it proposes. It says that it proposes to reduce the need to travel and energy consumption and then increases the number of sites in policy A29 and the number of homes allocated to 1750+ in an area where there is insufficient wealth creation at the very edge of the borough to employ the existing population let alone these proposed new residents, thereby creating even more commuter journeys. Ash and Tongham is being considered as a town when by definition they are not since a town is a place where people not only live but also work which is patently, not the case. Ash, Tongham, Ash Vale and Ash Green should still be afforded their individual identities and would have had, if the green buffer area which is now so important between Ash, Tongham and Aldershot, had been applied to them in the recent past. The green,Tranquil buffer (4.3.34) actually sits aside 4 lanes of fast moving traffic (except at peak times when the traffic is anything but).

The increase in the number of sites in policy A29 added to A28 means an increase of new homes in excess of 1800 new homes, all on green field sites in villages already known to be the second largest urban conurbation in Guildford borough. This increase is only surpassed by the proposed Wisley allocation of 2000. It does appear that other villages within the borough are not having to give up so much of their pleasant environment as Ash, Tongham and surrounds have done in the past and now again in this amended plan, not that I have any wish to see this "chase for growth and push the debt on the next generation" attitude inflicted on anybody else.

The site allocation of policy A29 now includes areas of Ash Green to the north, south and east of Ash Green road and South of Foreman Road which the plan purports to protect without any consideration for a green buffer apparently so important elsewhere.

The amended plan purports to protect sites of historic interest yet policy A29 is in direct conflict with this given its impact on Ash Manor.

The admission that the local infrastructure doesn't meet the needs of many of its residents and is considered poor by many (para 4.6.1) will not be addressed by infrastructure improvements for only those in these new developments (policy Id1). Thereby diminishing further the living standards of the existing residents due to the blight of new development as admitted in policy Id1.

The site apportioned in policy A29 for the new road bridge to relieve congestion caused by the Ash station level crossing has been deleted and is not identified elsewhere which suggests no priority for such an important infrastructure necessity now, regardless of future development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1151  Respondent: 17340769 / Saima Shah  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In reference to the revised Policy P2 Green Belt

I make the following objections:

- I object to the changes to Policy P2 because they have not addressed many of the 32,000 comments made to the 2016 plan.
- I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a sham.
- I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:
  - There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/ 2140630 and APP/Y3615/A/10/ 2131590 that the land here contributes to the “openness” of the Green Belt
  - There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV quality, exhibits ‘openness’ and contributes to the rural economy
  - The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog’s Back)
- Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas;
to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.

- Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital.
- It is incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.
- I object to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.
- I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.
- I am concerned that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN.
- Many Guildford villages are elongated in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp171/1157 | Respondent: | 17341057 / Sustainable Land Products Limited (Owen Davies) |
| Agent: | Roger Daniels |
| Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Spatial Vision (following paragraph 3.1) and Local Plan Policies S2 and P2, as amended, are not sound.

The Spatial Vision, as amended, does not include a sufficient number and variety of housing allocations to meet the identified growth needs of the Borough. The reliance on a limited number of strategic greenfield sites with substantial infrastructure requirements results in shortages of housing land supply in the early years of the plan and uncertainties about housing delivery in the later years of the plan. In particular, the Council has not included sufficient land in sustainable locations on the edges of the urban areas, in locations that would entail modifications to the inner boundaries of the Green Belt, such as Tangleys Place Farm, Worpleston.

The proposed phasing of housing supply in Policy S2 (spatial development strategy and annual housing targets), as amended, is not justified and does not meet the objectively-assessed need for housing consistently throughout the plan period. It is clear that there would not be a five-year supply of housing on adoption of the plan and there are also doubts
about whether housing targets will be met later, because of restrictions on the release of housing land imposed by Green Belt Policy (P2) and the reliance of the spatial development strategy on specific infrastructure improvements.

Policy P2 and the related maps of Green Belt boundaries, as amended, are not sound as they are based on a review of Green Belt boundaries that does not comply with paragraphs 84 and 85 of the National Planning Policy Framework. In particular, insufficient weight has been given to the need to promote sustainable patterns of development and to the consistency of the policy with meeting identified requirements for sustainable development.

Opportunities for sustainable development for housing and other uses associated within the edges of the main urban areas and other settlements have been overlooked because of an inappropriate approach to review of the Green Belt, based on the boundaries of arbitrary land parcels.

The review of Green Belt in the area of Tangley Place Farm, Worplesdon, exemplifies these shortcomings which are explained in detail in the Tangley Place Concept Statement that forms part of this submission. In this area, Green Belt boundaries should be reviewed, as described in the report, to accommodate a mix of housing and open space uses (including SANG and other open space uses) within revised Green Belt boundaries that reflect physical features that are readily recognisable and likely to be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See above and the accompanying report from Sustainable Land Products (Tangley Place Concept Statement) for further details.

Attached documents: 📄 BRS.5853_12 C Design Vision 230617.compressed (1).pdf (15.3 MB)

Comment ID: pslp171/1156  Respondent: 17341057 / Sustainable Land Products Limited (Owen Davies)  
Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Spatial Vision (following paragraph 3.1) and Local Plan Policies S2 and P2, as amended, are not sound.

The Spatial Vision, as amended, does not include a sufficient number and variety of housing allocations to meet the identified growth needs of the Borough. The reliance on a limited number of strategic greenfield sites with substantial infrastructure requirements results in shortages of housing land supply in the early years of the plan and uncertainties about housing delivery in the later years of the plan. In particular, the Council has not included sufficient land in sustainable locations on the edges of the urban areas, in locations that would entail modifications to the inner boundaries of the Green Belt, such as Tangley Place Farm, Worplesdon.

The proposed phasing of housing supply in Policy S2 (spatial development strategy and annual housing targets), as amended, is not justified and does not meet the objectively-assessed need for housing consistently throughout the plan period. It is clear that there would not be a five-year supply of housing on adoption of the plan and there are also doubts about whether housing targets will be met later, because of restrictions on the release of housing land imposed by Green Belt Policy (P2) and the reliance of the spatial development strategy on specific infrastructure improvements.

Policy P2 and the related maps of Green Belt boundaries, as amended, are not sound as they are based on a review of Green Belt boundaries that does not comply with paragraphs 84 and 85 of the National Planning Policy Framework. In particular,
insufficient weight has been given to the need to promote sustainable patterns of development and to the consistency of the policy with meeting identified requirements for sustainable development.

Opportunities for sustainable development for housing and other uses associated within the edges of the main urban areas and other settlements have been overlooked because of an inappropriate approach to review of the Green Belt, based on the boundaries of arbitrary land parcels.

The review of Green Belt in the area of Tangle Place Farm, Worplesdon, exemplifies these shortcomings which are explained in detail in the Tangle Place Concept Statement that forms part of this submission. In this area, Green Belt boundaries should be reviewed, as described in the report, to accommodate a mix of housing and open space uses (including SANG and other open space uses) within revised Green Belt boundaries that reflect physical features that are readily recognisable and likely to be permanent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See above and the attached report by Sustainable Land Products (Tangle Place Concept Statement) for further details.

Attached documents: BRS.5853_12 C Design Vision 230617.compressed (1).pdf (15.3 MB)

Comment ID: pslp17q/196  Respondent: 17341057 / Sustainable Land Products Limited (Owen Davies)
Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (;)

The accompanying report (Tangle Place Concept Statement) points to shortcomings in the Green Belt & Countryside Study as the basis for reviewing Green Belt boundaries and identifying appropriate allocations to meet the objectively-assessed need for housing throughout the plan period.

In particular, the Green Belt review does not comply with the requirements of paragraphs 84 and 85 of the National Planning Policy Framework, as it does not give sufficient weight to the need to promote sustainable patterns of development or reflect long-term development requirements.

In addition, the Land Availability Assessment is not based on a consistent rate of housing delivery that reflects housing requirements. It shows a shortfall in housing land supply throughout much of the plan period, including the absence of a five-year supply of housing land on adoption of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BRS.5853_12 C Design Vision 230617.compressed (1).pdf (15.3 MB)

Comment ID: pslp17q/198  Respondent: 17341057 / Sustainable Land Products Limited (Owen Davies)
Agent: Roger Daniels


Page 2528 of 2988
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Local Plan is not sound because it fails to comply with paragraphs 14, 47, 84, 85 and 182 of the National Planning Policy Framework.

In particular, the plan fails to meet the full objectively-assessed need for housing over the whole of the plan period and fails to achieve a five-year supply of housing land on adoption of the Local Plan.

In addition, the Review of Green Belt and the Spatial Development Strategy have not given sufficient weight to meeting the full objectively-assessed need for housing throughout the life of the plan and the need to promote sustainable patterns of development.

Please refer to the accompanying report by Sustainable Land Products (Tangley Place Concept Statement) for further details

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [BRS.5853_12 C Design Vision 230617.compressed (1).pdf](15.3 MB)

Comment ID: pslp17q/197  Respondent: 17341057 / Sustainable Land Products Limited (Owen Davies)
Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Although Guildford Borough Council has generally complied with the statutory procedures for preparing the Local Plan, it has not complied fully with the ‘Duty to Co-operate’ which is a statutory requirement in Section 110 of the Localism Act 2011; particularly in relation to housing provision and Green Belt review.

Please refer to the accompanying report from Sustainable Land Products (Tangley Place Concept Statement)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [BRS.5853_12 C Design Vision 230617.compressed (1).pdf](15.3 MB)

Comment ID: pslp17q/199  Respondent: 17341057 / Sustainable Land Products Limited (Owen Davies)
Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Duty to Co-operate Topic Paper records ongoing discussions with neighbouring districts in Surrey on the production of a Local Strategic Statement (LSS). It also describes co-operation on a joint Strategic Housing Market Assessment (SHMA) but it does not point to any substantive agreement with neighbouring councils to ensure that the delivery of housing will meet the objectively-assessed needs of the Housing Market Area (HMA) throughout the plan period.

Paragraph 4.49 of the Topic Report refers to a Statement of Common Ground in which the three neighbouring authorities of Guildford, Woking and Waverley have acknowledged that there is unmet need within the HMA, but the Statement simply 'commits the three authorities to continued future joint working to ensure that as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full.'

The NPPF is explicit, in paragraphs 47 and 182, that local planning authorities should meet the full objectively-assessed need for housing in the housing market area, subject to other considerations, and should consider unmet housing needs in neighbouring authorities when formulating their local plan strategy. This has not been done by Guildford and its neighbouring authorities.

The Topic Report also concedes (in paragraph 4.93), in relation to Green Belt review: 'As the broad methodology that underpins the study was developed prior to the NPPF and Localism Act, we did not engage with neighbouring authorities at that time.'

In relation to both housing and Green Belt review, it is therefore clear that the requirements of the Duty to Co-operate have not been met: in terms of the legislation in Section 110 of the Localism Act 2011; in terms of the policies of the National Planning Policy Framework; or in terms of the advice in Planning Practice Guidance.

Please refer to the accompanying report from Sustainable Land Products (Tangley Place Concept Statement) for further details.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BRS.5853_12 C Design Vision 230617.compressed (1).pdf (15.3 MB)

Comment ID: pslp171/1158  Respondent: 17341217 / HECS (Howard Watson)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of Ash Green Village which seems to be encompassed by these plans but is not mentioned by name. Ash Green village is a separate entity bounded by Ash Green road to the north and has been since the early 19th century. This village is not part of the Ash and Tongham Urban Area and the unbuilt on buffer area must remain between Ash Green Village and the Ash and Tongham Urban Area.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The buffer of Ash Manor should be maintained as it not only forms a natural buffer but is of historic significance.

Attached documents:

Comment ID: pslp172/2688  Respondent: 17343265 / Martin Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regard to site A35, development at the site of the former Wisley airfield, although I welcome the change in the number of new homes to be created from 'over 2000' to 'approximately 2000', this change does not go far enough. Approximately, allows for a figure considerably more than 2000 and the number should be amended again. I strongly object to the plan to inset the site from the green belt - although developed and used during the war as an airfield, the site was previously rural and it should be returned to its original usage. Nevertheless, if the borough insists on supporting this unwelcome development, then the proposed number of houses is still far too many and will result in a very crowded site, out of keeping with local patterns of building. The increase in the local population will result in an even greater increase in traffic on the local roads, increasing pollution, demand on services, waiting times in the local surgery, and congestion at the local railway stations. The size of the development is out of keeping with the local village of Ockham. The proposals to ensure the developers include infrastructure such as new schools etc will not address the issue that the increase in number of people will change the character of the local environment and congestion in the surrounding areas. In my view the number of proposed homes should therefore be reduced to 500. However, if the borough will not cut down the number in spite of the strong local opposition to the proposals at least 'approximately 2000' should be changed to 'no more than 2000'.

I also welcome the removal of A36 and A41 from the proposed sites for development in East and West Horsley, but I object to the numbers of houses still proposed in the other local developments A37 to A41 inclusive. These are excessive and the numbers of proposed properties at all of these sites should be halved in order to maintain an adequate rural quality to the local environment without unduly increasing the pressures on the local services, transport etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1161  Respondent: 17343265 / Martin Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Paragraph 2.13 overemphasises the facilities for pedestrians in the villages. In our village of East Horsley, except in the shopping parade, there is usually only one footway and in places these are very narrow and not safe to use. The footways are in poor condition and need repair. The statement that facilities to assist pedestrians in crossing the road are commonplace does not apply locally. There is only one pedestrian crossing in the whole village. The sentence on cycle lanes should be expanded to comment that on the majority of roads, there are no cycle lanes and in the majority of rural roads, especially through the villages, the roads are too narrow to accommodate cyclists safely.

I welcome the additions to paragraph 2.15, but the remainder of the plan is singularly lacking in a coherent plan to address the very poor state of the local roads in the borough. The proposed new housing developments will put a considerable additional temporary strain on the roads because of construction traffic, and a permanent additional strain from increased traffic in the future.

Vehicle Speeding is another transport issue that is not mentioned and needs to be addressed, especially with regard to any new developments, where 20mph limits should the norm in my view.

One important transport issue that should be mentioned in this section is the need to encourage more use of electric vehicles by the provision of electric charging points throughout the borough (not just in new developments) and ensuring that new developments must provide these, rather than just suggesting that they 'may' include such measures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1166  Respondent: 17343265 / Martin Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I welcome the strengthening of Policy ID3. However, paragraphs (1) and paragraph 4.6.22 should be strengthened further by adding "add providing facilities for charging electric vehicles". I support the encouragement of walking, cycling and public transport, but as an older member of the borough, I am well aware that these forms of transport are often not possible for the very young and the elderly and they will continue to need to use private transport. Moreover, it is inevitable that people will continue to want to use their car, even if other options are available. The policy as a whole does not pay sufficient attention to this need of a substantial number of the population: however, the wider adoption of electric vehicles would have major benefits for the environment from reduced air pollution and noise pollution.

Paragraph 4.6.22 should be strengthened further by adding "and use of electric vehicles"

Paragraph 4.6.27 should be improved by changing 'can' in 'Such measures can include car clubs, car sharing, facilities for electric charging plug-in points" to 'should'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

See above

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Refer to attached reports for evidence why our client considers that Broadford Business Park should be re-instated as a residential site allocation, as per draft Policy A34.

6.1 The NPPF states that the purpose of planning is to help achieve sustainable development. Paragraph 7 states that there are three dimensions to sustainable development, comprising economic, social and environmental roles. Paragraph 8 emphasises the need for the planning system to balance these different dimensions.

6.2 The fundamental premise of the NPPF is a presumption in favour of sustainable development and Paragraph 14 states that this should be seen as a golden thread running through both plan-making and decision-taking.

6.3 As previously accepted when GBC allocated Broadford Business Park for residential development, the Site complies with the definition of Sustainable Development as described in the NPPF. A residential development would be economically, socially and environmentally sustainable, and critically it would provide much needed housing, thus contributing to GBC’s 5YHLS.

6.4 Table 4 summarises how the proposals for Broadford Business Park comply with the definition of Sustainable Development as described in the NPPF.

[Table 4]

Case for maintaining the residential site allocation

6.5 As set out in Sections 1.0 and 4.0 of these representations, Zurich objects to the designation of Broadford Business Park as a LSES, and maintains the view that a residential development is the most appropriate use for the Site.

6.6 The Site is previously developed land in the Green Belt, and in view of the lack of suitable sites within Guildford’s urban areas and villages, the release of additional sites in the Green Belt and surrounding countryside is required. Broadford Business Park provides an opportunity to contribute towards GBC’s housing needs with a negligible impact on the openness of the Green Belt and the purposes of including land within it.

6.7 As identified by the redacted policy A34 set out in Table 5, GBC previously considered the site to be a deliverable residential site, with capacity for up to 100 homes.

[Table 4]

6.8 This draft policy was supported by the Land Availability Assessment (2016). Consistent with the deliverability tests described at footnote 11 to paragraph 47 of the NPPF, the 2016 LAA considers the suitability, availability and achievability of new development sites. In relation to Broadford Business Park (ref. 2186) the 2016 LAA stated:

“This site is most suited for residential development, to provide new homes to meet the identified need.”

6.9 It was also noted that development could take place from 2018, with the delivery phased in accordance with the building leases set out in Table 2.

Evidence previously submitted in support of residential development
6.10 Zurich supported previous residential allocation as part of their representations submitted in response to the previous Regulation 19 consultation in July 2016. The representations were accompanied by the following technical reports to demonstrate that the Site is free from insurmountable constraint and meets deliverability tests referred to in paragraph 47 of the NPPF.

- **Design Statement** – This included an illustrative masterplan to highlight the residential opportunities for the Site and demonstrate that the Site had capacity for 100 dwellings;

- **Commercial Refurbishment Viability Report** (since updated) – This set out why the continued employment use of the Site was no longer viable, including reference to the Sites condition and demand for such employment floorspace;

- **Flood Risk Advice Letter** (since updated) – This set out clearly the potential risk from flooding and identified what mitigation measures could be employed to both prevent flooding on site and improve the local flood risk levels generally;

- **Landscape and Visual Commentary** – This highlighted that a residential development would present opportunities to improve the visual impact of the Site on the Green Belt and the wider landscape; and

- **Transport Note** – This acknowledged the transport impact of the existing employment use and concluded that the level of traffic likely to be generated by a residential use would be similar to the existing use.

6.11 Since the 2016 GBLP consultation, there have been no material developments which would alter the conclusions of these reports, or the assessment of the Site contained within the 2016 LAA (ref. 2186).

6.12 An updated Commercial Viability Report, as discussed in Section 4.0, and Flood Risk - Sequential Test Assessment have been prepared in response to the updated evidence base that accompanies the latest consultation on the emerging GBLP to demonstrate the planning case for a residential development remains.

### Commercial viability

6.13 The updated CVR (and associated financial appraisals) considers the following:

- Whether the existing buildings are suitable for refurbishment or whether they have reached the end of their economic life.

- Whether redevelopment of the site for employment use is economically viable.

- Whether there is a need for this current space within the Borough for employment purposes or whether there are better suited locations.

6.14 The report advises that the existing buildings are failing and the considerable cost of their refurbishment is not a viable option for a developer. It also confirms that alternate employment uses on the site as part of a redevelopment proposal would be unviable and, in any event, the site is not best placed for such a use in terms of location or demand. Its concluding remark is:

> "Refurbishment of the existing office stock or the redevelopment of the site with a new office scheme will not offer a viable proposition for developers or investors. If the Property were to be brought to the market in its current form we are of the opinion that demand will be from residential developers."

6.15 A detailed assessment of the CVR is provided in Section 4.0 of these representations.

### Flood risk sequential test

6.16 As previously noted, the Site lies partly within Flood Zone 1, 2 and 3. When considering the flood risk implications of new development in areas prone to flooding, the PPG states that:

> "A local planning authority should demonstrate through evidence that it has considered a range of options in the site allocation process, using the Strategic Flood Risk Assessment to apply the Sequential Test and the Exception Test where necessary. This can be undertaken directly or, ideally, as part of the sustainability appraisal. Where
other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications for any decision to allocate land in areas at high flood risk in the sustainability appraisal report. The Sequential Test can also be demonstrated in a free-standing document, or as part of strategic housing land or employment land availability assessments”[14].

6.17 Zurich have noted that GBC have not included an updated Flood Risk Sequential Test as part of the updated evidence base for the GBLP. Therefore, in order to give GBC comfort that the Site would continue comply with the sequential test requirements.

6.18 WSP’s assessment demonstrates that the Site is sequentially better than the alternative sites and that there is no requirement for the Exception Test to be considered at this stage. The site should therefore be allocated for residential use.

6.19 Notwithstanding this, Zurich would recommend that GBC updates its Flood Risk Sequential Test prior to submission of the GBLP for examination in order to ensure the evidence base is robust.

**Deliverability of residential proposals**

6.20 Zurich is committed to ensuring the optimal amount of new homes are delivered on the Site in order to provide a meaningful contribution to the GBC’s housing needs, including the unmet housing need from Woking Borough Council, at an early stage within the plan period. The Site continues to be free from insurmountable constraint, including passing any updated flood risk sequential test should look to undertake.

6.21 As explained in Section 2.0 of these representations, the Site is wholly within the single freehold ownership of Zurich. The majority of the Site will be available for redevelopment by 2019 through vacant procession, with Bishopsgate House available to be included as a second phase by 2022 (still within the first five years of the plan). As a result of the progress in the preparation of the Local Plan being delayed, the site would now available for development within the first 5 years of the plan period, which will provide a meaningful contribution to the borough’s short term and urgent housing needs and as well as GBC’s unfulfilled 5YHLS.

6.22 Zurich does not consider that the Site’s circumstances have materially changed since it was found to be suitable and allocated for residential development in 2016. With it having been demonstrated that the designation of the site for employment purposes is unsustainable and the clear evidence showing that residential site allocation is deliverable, Zurich strongly advocates that GBC reconsider the decision to allocate Broadford Business Park for employment use, and recognise the potential of the Site to deliver much needed housing in GBC. Housing which can be delivered in the short term, subject to planning.


7.1 Zurich consider that the GBLP prepared by GBC has adopted an approach that is not ‘positively prepared’, ‘justified’, ‘effective’ or ‘consistent with national policy’. Therefore, the GBLP fails to satisfy the ‘soundness’ tests outlined in paragraph 182 of the NPPF.

7.2 In summary, Zurich’s overall conclusions in responding to the GBLP consultation are as follows:

- Zurich supports GBC’s improve housing delivery in the borough, the current housing target cannot be considered as meeting OAHN in full as required by the NPPF, on the basis that the GBLP currently only seeks to meet the OAHN for Guildford, despite there being an unmet need in WOK;

- Zurich recommends that GBC should proactively seek to meet full OAHN by reconsidering those sites removed as part of LAA2 in order to meet this unmet need and improve affordability in the borough;

- The existing buildings at Broadford Business Park are poor quality and in need of substantial investment, which is unlikely to be forthcoming in view of local market conditions. The current proposal to designate Broadford Business Park as a ‘Locally Significant Employment Site’ is therefore not viable or sustainable in the medium to long term;
• The Site continues to pass the flood risk sequential test required to support the GBLP. Notwithstanding this, GBC should update its flood risk sequential test to be based on the latest list of sites contained within the 2017 LAA2 prior to the GBLP being submitted for examination;

• Site specific technical work supports Zurich’s conclusion that the Site is suitable for release from the Green Belt, and initial development proposals demonstrate that future development would meet the objectives of the GBLP, would be ‘deliverable’ in accordance with footnote 11 of paragraph 47 of the NPPF and would represent a sustainable residential development;

• “Exceptional circumstances” exist to release additional Green Belt sites beyond those currently included within the GBLP, in order to seek to meet full OAN;

• The Site is capable of delivering a meaningful level of new market and affordable housing; and

• The Site is within the single freehold ownership of Zurich with the existing tenant leases due to expire shortly or have break clauses available meaning that any redevelopment for residential purposes could come forward in the first five years of the plan.

7.3 GBC acknowledge that there is an acute shortage of housing in the borough that makes the borough one of the most unaffordable places to live in the UK. These representations have demonstrated that the Site is not a suitable location for employment uses and refurbishing/replacing the existing buildings to an acceptable standard is not a viable proposition, thereby meaning the Site would be likely to become derelict. When weighed against the chronic housing shortages in the borough, Zurich consider that the need for housing clearly outweighs protecting the Site as an unviable employment location.

7.4 Therefore, in order for GBC to be able to meet its full OAN, or increase its ability to do so, the list of site allocations should be amended to, at the very least, include sites that were included in the previous version of the GBLP consulted upon in June/July 2016. Similarly, Zurich strongly believes Policy A34 should be reinstated, with Broadford Business Park allocated for residential use to meet the identified housing need.

7.5 Zurich would welcome an opportunity to discuss our findings in more detail with the Council’s officers and members, prior to the GBLP being finalised and submitted to the Secretary of State, in seeking to resolve the objections and ensure that the plan can subsequently be found sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Re-instate Broadford Business Park as a residential site allocation as per draft Policy A34.

Attached documents:
- Commercial_Viability_Report_July_2017_plus_app.pdf (4.9 MB)
- Broadford Business Park - Sequential Test.pdf (63 KB)
- 170724 - Broadford Business Park Reg 19 Reps (FINAL).pdf (704 KB)

Comment ID: pslp171/1178  Respondent: 17343361 / Zurich Assurance Limited  Agent: Barton Willmore LLP (Gary Stevens)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Refer to the attached reports for evidence why designating Broadford Business Park as a Locally Significant Employment Site is unviable and unsustainable in the medium to long term, thereby meaning that the scope of this policy cannot be delivered. As a result, this policy has not been 'positively prepared', 'justified', 'effective' or 'consistent with national policy' as required by paragraph 182 of the NPPF and associated national guidance.

Policy context

4.1 Paragraph 17 of the NPPF sets out core land-use planning principles that should underpin both plan-making and decision-taking. It requires Local Planning Authorities to:

“Objectively identify and then meet... business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their areas, taking account of the needs of the residential and business communities.”

4.2 Local Planning Authorities should seek to address the quantity of economic development floorspace needed based on qualitative assessments of each market segment. Assessing development needs should be proportionate and consider only those future scenarios that could be reasonably expected to occur (Paragraph 003, PPG)[11].

4.3 In establishing the Functional Economic Market Area (FEMA) from which a local planning authority should use to determine the employment land needs for a specified area, paragraph 012 of the PPG[12] refers to the following factors that should be taken into account:

“The geography of commercial property markets should be thought of in terms of the requirements of the market in terms of the location of premises, and the spatial factors used in analysing demand and supply – often referred to as the functional economic market area. Since patterns of economic activity vary from place to place, there is no standard approach to defining a functional economic market area, however, it is possible to define them taking account of factors including:

- extent of any Local Enterprise Partnership within the area;
- travel to work areas;
- housing market area;
- flow of goods, services and information within the local economy;
- service market for consumers;
- administrative area;
- Catchment areas of facilities providing cultural and social well-being;
- transport network.

[12] PPG, paragraph: 012 Reference ID: 2a-012-20140306

Suggested Data Source: Office of National Statistics (travel to work areas)”.

4.4 Once the FEMA for an area has been established, which in GBC’s case includes parts of Waverley and Woking Boroughs, the paragraph 030 of the PPG[13] states that in being able to understand the current market in relation to economic and main town centre uses as well as current and future employment land needs, plan makers should:

“...should liaise closely with the business community to understand their current and potential future requirements. Plan makers should also consider:

- The recent pattern of employment land supply and loss to other uses (based on extant planning permissions and planning applications). This can be generated through a simple assessment of employment land by sub-areas and market segment, where there are distinct property market areas within authorities.
- Market intelligence (from local data and discussions with developers and property agents, recent surveys of business needs or engagement with business and economic forums).
• Market signals, such as levels and changes in rental values, and differentials between land values in different uses.
• Public information on employment land and premises required.
• Information held by other public sector bodies and utilities in relation to infrastructure constraints.
• The existing stock of employment land. This will indicate the demand for and supply of employment land and determine the likely business needs and future market requirements (though it is important to recognise that existing stock may not reflect the future needs of business). Recent statistics on take-up of sites should be consulted at this stage, along with other primary and secondary data sources to gain an understanding of the spatial implications of ‘revealed demand’ for employment land.
• The locational and premises requirements of particular types of business.
• Identification of oversupply and evidence of market failure (eg physical or ownership constraints that prevent the employment site being used effectively, which could be evidenced by unfulfilled requirements from business, yet developers are not prepared to build premises at the prevailing market rents).”

4.5 Using this evidence, local planning authorities should identify sufficient land to satisfy current and future employment needs. Paragraph 22 of the NPPF, however, notes that:

“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”


4.6 Consistent with the above policy context, Zurich is able to provide up to date market intelligence to help inform GBC’s evidence base and soundness of the emerging employment related policy position set out in the GBLP.

Characteristics of Broadford Business Park

4.7 The latest version of the GBLP seeks an increased number of B Class jobs by 2034 (4,100, previously 3,200) as a result of the new Employment Land Needs Assessment (ELNA) (2017). The ELNA has also resulted in adjustments to the amount of land allocated for employment use, as set out in Table 1.

[Table 1]

4.8 Zurich supports GBC’s intent, as set out within Policy E1, to deliver new jobs across the borough and to utilise sustainable employment development patterns to achieve this. Zurich, however, strongly objects to GBC’s decision to designate Broadford Business Park as a LSES.

4.9 Paragraph 6.7 of the Briefing Note to GBC’s Borough, Economy and Infrastructure Executive Advisory Board Committee, and repeated in the agenda papers for the subsequent full Council meeting on 16 May 2017, states the reason for change in the planning policy designation is as follows:

“…we are concerned at our ability to provide sufficient and varied office floorspace. Broadford is an established business park and, whilst not sequentially preferable [our emphasis], is considered suitable given our inability to identify sufficient sequentially preferable sites. The vast majority of our office floorspace is proposed to be allocated on the extension to the Surrey Research Park – retention of Broadford will help provide a variety and mix of floorspace.”

4.10 In this statement, GBC acknowledges that Broadford Business Park is not situated in a sequentially preferable location for employment purposes. As illustrated by Table 2, extracted from Table 4-2 of the Guildford Borough Employment Land Needs Assessment (2017), the Site has numerous constraints, including (but not limited to) ‘poor’ access to public transport and ‘very poor’ access to amenities and facilities, that would hamper the ability to secure a long term employment use on the Site.

[Table 2]
4.11 GBC have acknowledged Broadford Business Park is not situated in a location that is conducive to employment uses. The buildings at Broadford Business Park have now reached the end of their economic lives, and require substantial investment to bring it up to acceptable standards or redevelop for employment use. Furthermore, the occupants of the existing development are on short term leasehold arrangements that benefit from reduced rental levels to reflect the poor condition of the existing buildings and its relatively remote location that cannot continue. Zurich are therefore concerned that proposed designation of the site as a LSES is unsustainable in the medium to long term and will simply result in vacant floor space that could otherwise be used more effectively i.e. for residential purposes.

4.12 A Commercial Viability Report (CVR) prepared by Savills, has been submitted in support of these representations to evidence the challenges in maintaining employment uses at the Site. The CVR provides an analysis of the current market conditions for the Site, the viability for a new build (employment) proposal, and, the viability of refurbishing the existing units to acceptable standards in order to demonstrate whether Broadford Business Park is sustainable employment site. The key points have been summarised below.

**Market commentary**

4.13 The development over time of Guildford has rendered it attractive for employers, however, the office supply and development is limited due to the historic nature of the town. This has resulted in purpose built office space to be located away from the centre of the town in business parks such as Surrey Research Park, The Astolat Business Park and Guildford Business Park. These business parks, however, possess key difference to Broadford Business Park in that they benefit from good access to the strategic road network, public transport and/or supporting services and facilities, thus making them more attractive to tenants.

4.14 The CVR notes that the majority of vacant space within a 5 mile radius of Broadford Business Park is within Guildford Town Centre (34 offices) and Godalming Town Centre (9 offices). There is approximately 220,756 sq.ft available which is approximately 28% of office stock. The 5 year average for this is 141,617 sq.ft or 18% of available stock.

4.15 The trend for any new speculative development has been to build close to good transport links with access to a large workforce rather than more isolated locations. Recent surveys and letting activity shows that demand for occupation is located heavily around transport links for staff and amenities as well as the quality of the office accommodation. Thus, take up has been more heavily centred around Guildford town centre with results now showing a 58% town centre to 42% out of town centre share. Previously these levels were at 34% town centre to 66% out of town centre share.

4.16 Consequently, occupiers are looking for modern office space either in the centre of Guildford or to the north, east or west where access to the A3 and mainline train services is more readily available. The Local Plan recognises this and states that new employment uses should have access to transport interchanges. In support of this policy, GBC’s Transport Strategy (2017), sets out several public transport improvements (such as additional rail platforms at Guildford Railway Station, increased frequency bus services and improved cycle parking facilities) as well as enhancements to the A3 trunk road.

4.17 Broadford Business Park, however, is poorly served by public transport, such that workers must rely on private modes of transport to travel to and from the Site. This is recognised by GBC’s ELNA, which rates the Site’s access to public transport as ‘poor’. The Site also lacks direct access to the A3 and the wider strategic road network.

4.18 Although the Site exhibits good quality environment and public realm characteristics, it suffers from poor access to amenities and facilities. Additional services and facilities, such as a coffee station or similar, could be introduced. This would, however, result in higher service charges or increased rent, which would end the competitive rent levels tenants currently benefit from.

4.19 Market sentiment is therefore for modern offices located in the town centres of Guildford, Godalming or the larger business park development in the borough that benefit from good transport links for staff and deliveries, and access to amenities and facilities.

**Office to residential permitted development rights**
4.20 GBC have indicated that the decision to designate the Site as an employment site was, in part, due to the loss of available office stock through office to residential permitted development right conversions. Paragraph 5.22 of the CVR notes that only 30% of the floor space assumed to be lost to such changes of use has actually taken place in the last three years and as such it is not realistic assumption that the all affected office premises would be lost to residential use.

4.21 In addition, paragraph 5.23 of the CVR notes that GBC are intending on introducing an Article 4 Direction to withdraw office to residential permitted development rights, which is likely to prevent a large number of these changes of use from being able to take place.

4.22 Zurich therefore consider that GBC have exaggerated the effect of the loss of existing office stock to residential uses.

New build viability

4.23 In addition to the market conditions relevant to the Site and surrounding area, the CVR includes a number of appraisals looking at possible new scheme developments for both office and industrial accommodation. The alternative new build office scheme comprises six buildings. One option assumes 2 storeys, another 3 storeys, and a third assumes a double height single storey light industrial scheme on the same floor plates.

4.24 Whilst the appraisals for the new build schemes show that an industrial scheme would be more viable than a three storey office scheme. It is also noted that the location itself is unsuited to heavy goods vehicle activity which inevitably is the case with industrial occupiers. The narrow bridge to the west also restricts access to the A3 and the Site by larger vehicles needed to support a business park or light industrial development and is also sensitively located within close proximity to residential uses.

4.25 All of the development options that have been tested have therefore been found to unviable and would be very unlikely to attract investment from prospective developers. More intensive uses of the Site have been considered but discounted on the basis these would be unviable, there being insufficient space for the car parking levels required to offset the Site’s poor public transport and strategic infrastructure connections and that the semi-rural character of the locality is not suitable for high rise development.

Refurbishment viability

4.26 Several of the existing buildings and plant are reaching the end of their serviceable lives and require substantial investment in the near future to enable them to continue to be lettable commercial tenants. As a reflection of the poor condition of the buildings, current occupiers have benefitted from low rents in recent years. This arrangement is not, however, sustainable in the medium to long term.

4.27 The CVR explains that the cost of refurbishing the existing buildings up to standards commensurate with a modern office and capable of attractive interest from the local market would not be commercially viable, due to the limited rent currently secured on existing tenants and the subsequent upward pressure on rental levels being likely to render the Site uncompetitive in the market place when compared to better serviced town centre locations.

4.28 Based on the inability to justify the level of investment required to refurbish the buildings to acceptable standards, it is likely that if the currently proposed LSES designation were to be maintained the Site would become derelict. Refurbishment of the existing buildings is therefore not a viable proposition.

Vacant possession

4.29 Zurich will gain vacant possession of the majority of the Site by 2019, with the remaining building by 2022. As such there is a reasonable prospect that a residential development (subject to planning permission being granted) could commence from 2019 with Bishopsgate House retained in the first instance and redeveloped as a second phase.

[Table 3]

4.30 The removal of the employment designation, would therefore enable Broadford Business Park to deliver housing within the short term, thus improving GBC’s 5YHLS position, whilst bringing forward the benefits of such development and should be considered.
Summary and conclusion

4.31 Broadford Business Park has reached the end of its economic life, and requires significant investment in order to bring it up to acceptable standards. However, as assessed by the CRVR, and recognised by the ELNA, the Site is constrained by a number of factors including:

- Lack of direct access to the A3 and wider strategic road network;
- Poor accessibility to public transport; and
- Very poor accessibility to amenities and facilities.

4.32 These factors, which are beyond the control of Zurich, have contributed towards the low market rents achievable in this location. The rental value of the employment floorspace is further reduced its relatively poor quality. The attractiveness of Broadford Park as a business location is therefore predicated on low rents.

4.33 The buildings and associated plant at Broadford Business Park are reaching the end of their serviceable lives. Significant investment is required in order to bring them up to acceptable standards. However, the market conditions in the south of Guildford render such investments unviable.

4.34 Notwithstanding the inability to secure investment, the Site would continue to suffer from the same issues such as poor transport communication links. To offset any upgrade to the existing buildings required to maintain them at an acceptable standard, rental levels would inevitably need to increase. This would be out of step with the out of town location of the Site and would be unlikely to attract interest from prospective tenants. These factors alone would make the refurbishment or redevelopment unviable with the likely result being that the Site would become derelict.

4.35 On the basis of the above, Zurich considers Policy E1 to not be ‘positively prepared’, ‘justified’, ‘effective’ or ‘consistent with national policy’. As a result, the policy does not comply with paragraph 182 of the NPPF and is regarded as being unsound.

4.36 Zurich therefore strongly recommends that GBC removes the proposed LSES designation of Broadford Business Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Refer to the attached reports for guidance on the need to remove Broadford Business Park from the list of Locally Significant Employment Sites.

Attached documents: 
- Commercial_Viability_Report_July_2017_plus_app.pdf (4.9 MB)
- 170724 - Broadford Business Park Reg 19 Reps (FINAL).pdf (704 KB)

Comment ID: pslp171/1179  Respondent: 17343361 / Zurich Assurance Limited  Agent: Barton Willmore LLP (Gary Stevens)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Refer to attached report for confirmation of our client's support for the proposed revisions to Policy E3.

[text of attachment reproduced below]

5.1 Policy E3 seeks to “sustain and enhance” employment capacity (land, floorspace and jobs) in the Borough. It advises that employment floorspace will be protected across the Borough, particularly on the Strategic Employment Sites and Locally Significant Employment Sites, unless marketing evidence (varying levels of detail dependent on the site’s employment status) is provided to justify its loss.

5.2 Zurich supports the flexibility that has been included in the revised wording of Policy E3 and the clear guidance provided in Appendix A2, particularly in terms of the evidence required to justify the loss of an employment use. The proposed checklist included within a new SPD to appraise evidence of marketing and to ensure a consistent approach is taken for all application is equally welcome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

N/A

Attached documents: 170724 - Broadford Business Park Reg 19 Reps (FINAL).pdf (704 KB)

Comment ID: pslp171/1177  Respondent: 17343361 / Zurich Assurance Limited  Agent: Barton Willmore LLP (Gary Stevens)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Refer to the attached report for evidence why the proposed housing target set out in Policy S2 fails to address Woking Borough Council's unmet housing needs and cannot therefore be regarded as being sound.

[text of attachment reproduced below]

3.1 The NPPF sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).

3.2 In respect of delivering a wide choice of high quality homes, the NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that LPAs should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).

3.3 Paragraph 47 also requires Local Planning Authorities (LPAs) to:

• Use their Evidence Base to ensure that their Local Plan meets the full, Objectively Assessed Needs (OAN) for market and affordable housing in the Housing Market Area (HMA), as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
• Identify and update annually a supply of specific deliverable sites sufficient to provide 5-years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, LPA’s should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

• Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;

• For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a 5-year supply of housing land to meet their housing target; and;

• Set out their own approach to housing density to reflect local circumstances.

3.4 With regard to plan-making, LPAs are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156). Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of, and strategies for, housing and employment uses, taking full account of relevant market and economic data (paragraph 158).

3.5 For plan-making purposes, local planning authorities are required to have a clear understanding of housing needs in their area. To do so they should prepare a Strategic Housing Market Assessment (SHMA) that identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period (paragraph 159).

3.6 The Local Plan will be examined by an independent Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. LPA should submit a plan for examination which it considers is “sound” – one that it is positively prepared – and the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development (paragraph 182).

Overall housing strategy

3.7 Guildford forms part of the West Surrey HMA, which is made up of three authorities, namely the administrative areas of Guildford, Waverley and Woking Borough Council’s. In keeping with the Duty to Cooperate (Para 178, NPPF), Woking Borough Council (WOK), Waverley Borough Council (WAV) and Guildford Borough Council (GBC), signed the West Surrey Memorandum of Understanding (MoU). The MoU confirms that the geographical area of the three boroughs forms a common HMA for this part of Surrey and sets out a framework for partnership (underpinned by a Statement of Common Ground) to carry out a SHMA for the West Surrey HMA.

3.8 To support economic growth and tackle the acute under supply of housing and affordability issues that affect Guildford, the West Surrey SHMA: Guildford Addendum Report (March 2017) identifies that GBC has an Objectively Assessed Housing Need (OAHN) of 645 dwellings per annum (dpa).

3.9 Paragraphs 4.1.5 to 4.1.11 of the GBLP set out GBC’s spatial development strategy, identifying the scale and distribution of development. With reference to the OAHN contained in the West Surrey SHMA, these paragraphs support Policy S2, GBC’s Borough Wide Strategy, which identifies overall minimum housing requirement of 12,426 dwellings to be built across the borough between 2015 and 2034. Having accepted the need to meet OAHN in full, the annualised housing target (645 dpa) contained in the GBLP matches annualised OAHN target outlined in the West Surrey SHMA.

3.10 Zurich appreciates that GBC have endeavoured to produce a plan that is ‘positively prepared’ in accordance with paragraph 182 of the NPPF and ‘boost significantly’ its supply of housing (paragraph 47, NPPF) by uplifting the borough’s overall housing target, compared to earlier iterations of the plan. However, concerns are nevertheless raised whether the OAHN figure outlined in the SHMA and subsequent housing target can truly be considered to represent full OAHN. Zurich consider it vitally important to bring forward new housing quickly and meet OAHN in full throughout the plan period. To this end, Zurich encourages GBC to recognise the positive contribution Broadford Business Park can make towards meeting these annual housing targets. Zurich’s concerns are explored below.
3.11 In accordance with the NPPF, the three authorities that make up the West Surrey HMA have agreed to collectively assess their OAHN as a single HMA that is then broken down into the constituent authorities’ areas. Critically, the MoU acknowledges the shared responsibility of all three authorities to meet the full OAHN of the West Surrey HMA.

3.12 Of the three authorities, WOK is the only one with an adopted Core Strategy. The Core Strategy was adopted on October 2012, albeit with a requirement for an ‘early review’ of the plan (although this it is noted that this has not taken place), and has a plan period up to 2027. It has an adopted housing requirement of 292 dpa, against its objectively assessed housing need of 517 dpa (or 10,340 dwellings for the period 2013-33).

3.13 Using the net housing delivery figures contained within WOK’s 2015/16 AMR, the forecast delivery for the 2016-21 period contained within WOK’s Five Year Housing Land Supply Position Statement 2016, and, the 292 dpa housing target contained within WOK’s Core Strategy for the period 2021-27, it is possible to forecast WOK’s housing delivery for the adopted plan period up to 2027. The calculation shows that for this period, WOK will deliver 5,078 dwellings. This is 5,262 dwellings less than WOK’s OAHN as identified by the 2015 version of the West Surrey SHMA.

3.14 WOK is currently preparing a new Site Allocations DPD, however, WOK’s Hearing Statement[4] to Examination in Public (EiP) of WAV’s New Local Plan that:


‘The Site Allocations DPD has been identified with the purpose of identifying deliverable sites to enable the sustainable delivery of the development requirements of the Core Strategy. [and] …it is not intended to identify sites to meet unmet need within the Housing Market Area.’

3.15 Thus, WOK do not intend to meet the unmet housing need within its administrative boundary. Instead, WOK refer to the agreed Statement of Common Ground and the abovementioned MoU which set out how WOK, WAV and GBC will work together to:

‘address any residual unmet need within the [West Surrey] Housing Market Area after their Local Plans are adopted’[5].

3.16 Question 2.1 contained within the ‘Matters and Issues for Examination’ prepared by Inspector Jonathan Bore for the Examination in Public (EiP) of WAV’s New Local Plan[6] queries how WAV intends to meet WOK’s unmet housing need. Zurich believes that Inspector Bore’s concerns to be equally valid to GBC on the basis the three authorities form part of the same HMA.

3.17 Physically, WOK is almost 1/4 of the land area of GBC. In meeting Core Strategy 2012 housing target of 292 dpa, WOK has sought higher density developments on existing brownfield sites, which are now increasingly in short supply.

3.18 Considering the unmet need arising from WOK’s current OAHN figure of 517 dpa against its land availability pressures, it is essential that WAV and GBC follow a coordinated approach in ensuring the shortfall in meeting the full OAHN in the West Surrey HMA is addressed. Without this, GBC, WOK and WAV will be unable to satisfy paragraph 47 of the NPPF, thereby rendering the GBLP unsound.

3.19 At the EiP of WAV’s New Local Plan (July 2017), Inspector Bore made clear that WAV is obligated to meet at least half of WOK’s unmet housing need. Consistent with the view of Inspector Bore, Zurich considers GBC and WAV should explore taking responsibility for the unmet need on a 50:50 basis (i.e. 2,631 dwellings each). This would require GBC to increase its housing target from 12,426 dwellings to 15,507 dwellings, or an additional 175 dpa across the plan period 2019-34.

3.20 It should also be noted that GBC has an affordability ratio amongst the worst in the country, at over 10. The ratio is similar to that recently considered in the examination of the Mid Sussex Local Plan. Zurich therefore highlights and agrees with the Inspector’s conclusions at Mid Sussex[7], recommends increasing the OAHN and associated housing target to improve affordability in the borough.
3.21 As currently drafted, the GBLP does not meet any of WOK’s unmet need and so means the plan cannot be deemed to have been ‘positively prepared’, ‘effective’ or ‘consistent with national policy’, as required by paragraph 182 of the NPPF.

3.22 As highlighted by the allocation of sites such as Broadford Business Park as part of the previous iteration of the GBLP (June 2016), it is clear that suitably identified land exists within GBC to support residential development and assist in accommodating WOK’s unmet housing need and improve the availability and affordability of housing in the borough.

**Exceptional circumstances**

3.23 To achieve GBLP’s objective of meeting OAHN in full, GBC have accepted that ‘exceptional circumstances’, as referred to in paragraph 83 of the NPPF, exist to allocate sites in the Green Belt for development. The relationship between meeting OAN and Green Belt constraints is well tested in case law[8].

3.24 As endorsed in these High Court Judgments, plan-making is a two stage approach (NPPF, para 47), in that an objective assessment of housing need is first required, and then a distinct assessment as to whether (and, if so, to what extent) other policies dictate or justify constraint, such as Green Belt designation. There is no evidence available to demonstrate that GBC has come to the conclusion that 654 dpa represents the “upper limit” of “exceptional circumstances” or that there borough is subject to unreasonable constraint. It should be noted that the Inspector responsible for the EiP into Waverley’s Local Plan found that the additional impact on traffic and highway capacity arising from accommodating WOK unmet supply housing was insufficient grounds to avoid meeting OAHN in full.

3.25 Accordingly, it is considered that “exceptional circumstances” exist to release additional Green Belt sites beyond those currently included within the GBLP, in order to seek to meet full OAN.


**Housing trajectory**

3.26 Policy S2 states the annualised housing target will gradually increase from 450 dpa in 2019/20 to 850 dpa in 2033/34. As currently proposed, the housing trajectory for 2019-34 does not provide a reasonable estimate of delivery over the plan period, with an overreliance on the redevelopment of the former Wisley Airfield as a source of housing supply. The proposed development at Wisley represents over a sixth of the total new homes planned for GBC.

3.27 The housing trajectory needs to be considered in the context of the planning appeal[9] (to be heard in September 2017), against GBC’s decision to refuse planning permission for the redevelopment of this site. Assuming the Inspector upholds GBC’s decision to refuse planning permission, this will delay the delivery of housing.

3.28 Large sites such as the former Wisley Airfield take time to progress through the planning process, with complexities in infrastructure delivery and phasing further increasing the time required to delivery new housing. As such, any benefits from these sites are not likely to be felt until much later, and potentially beyond, the identified plan period.
3.29 The overreliance of major developed sites as part of a housing strategy has been previously considered in the Inspector’s Report into the Runnymede Local Plan, which was found unsound in 2014[10].

3.30 The housing trajectory, at present, does not comply with the requirement of paragraph 21 of the NPPF that:

‘policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.’

3.31 The allocation of sites such as Broadford Business Park, which have previously been allocated for residential development and can be developed earlier in the plan period, will help to diversify the spatial strategy and sources of housing supply in the borough, thereby enabling the chronic under supply of housing in the borough to be addressed more quickly.

**Five year housing land supply and backlog need**

3.32 The Land Availability Assessment Addendum (LAA2) (2017) identifies the following record of completions against the housing requirement during the period 2015-17:

- 2015/16 – 381 net completions (-273 deficit)
- 2016/17 – 297 net completion (-357 deficit)

[9] Appeal ref: APP/Y3615/W/16/3159894

3.33 Based on the above:

- GBC has a cumulative under delivery of 630 dwellings to date against its identified OAHN;
- This is likely to increase as a result of further under delivery in the latest reporting year (2016/17); and
- GBC has failed to meet its OAHN for the past four years.

3.34 GBC has therefore persistently under delivered against its housing targets and a 20% buffer should be applied to its housing requirement.

3.35 The LAA2 recognises this and notes the requirement for the 2017-22 period is 4,681 dwellings (inc. 20% buffer). However, GBC has only identified land for a total of 2,210 dwellings that are capable of being delivered within the first five years of the plan. This total includes sites with planning permission, sites without planning permissions and the windfall allowance.

3.36 Notwithstanding potential concerns in relation the deliverability of the sites included within GBC’s identified supply, the LAA2 concedes that GBC is currently only able to demonstrate a 2.36 years’ supply of deliverable housing. Paragraph 49 of the NPPF states that:

“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”.

3.37 GBC has sought to phase the delivery of housing across the plan period. However, during the first five years of the plan period (2019/2020 – 2023/2024) the GBLP targets that between 450 and 500 new homes will be built across the borough. This falls significantly short of the 645 dpa identified in the West Surrey SHMA as needing to be delivered to meet GBC’s identified need (not accounting for WOK’s unmet need, as discussed above). Such an approach is inconsistent with the need to ‘boost significantly’ the supply of housing, as set out in paragraph 47 of the NPPF, make up the current backlog of housing delivery and ensure that GBC can demonstrate a robust five year housing land supply earlier in the plan period.
3.38 However, when taking into consideration GBC's identified OAHN, housing delivery performance to date, and forecast delivery, it is unlikely that GBC will be able to demonstrate a five year housing land supply for the entire duration of the GBLP.

Summary and conclusion

3.39 Zurich considers that the failure to meet WOK’s unmet housing need and the lack of deliverable sites being identified early in the plan period to quickly address the severe housing shortages in the borough, means that Policy S2 cannot be considered as being ‘positively prepared’, ‘effective’ or ‘consistent with national policy’, as required by paragraph 182 of the NPPF. Accordingly, Zurich consider the policy as it stands to be unsound.

3.40 To resolve this, Zurich considers GBC should identify additional sites that can contribute towards meeting the borough housing needs at an earlier stage of the plan period. As discussed later in these representations, Broadford Business Park is deliverable and offers an opportunity to assist GBC in meeting this shortfall in supply. In addition, a further review of the allocations made as part of LAA1 could also be undertaken, to identify ‘suitable’ and ‘available’ sites, that could be delivered in the short term and contribute towards GBC’s 5YHLS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Refer to the attached report for advice regarding the need to increase the housing target in the Proposed Submission Local Plan to meet the true OAHN i.e. meeting any unmet housing need, for the borough in full.

Attached documents:
- 170724 - Broadford Business Park Reg 19 Reps (FINAL).pdf (704 KB)

Comment ID: pslp17q/212  Respondent: 17343361 / Zurich Assurance Limited  Agent: Barton Willmore LLP (Gary Stevens)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Refer to attached documents for comments on the following evidence base documents:

- Strategic Housing Market Assessment
- Employment Land Needs Assessment
- Flood Risk Sequential Test

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Commercial Viability Report July 2017 plus app.pdf (5.0 MB)
- Broadford Business Park - Sequential Test.pdf (63 KB)
- 170724 - Broadford Business Park Reg 19 Reps (FINAL).pdf (704 KB)

Comment ID: pslp17q/215  Respondent: 17343361 / Zurich Assurance Limited  Agent: Barton Willmore LLP (Gary Stevens)

Refer to the attached documents that set out our client's case for why the following aspects of the plan are unsound:

- Meeting objectively assessed housing needs, including Woking Borough Council's unmet housing needs (Policy S2: Planning for the borough - our spatial development strategy)
- Ensuring a robust and deliverable employment land strategy (Policy E1: Meeting employment needs and Policy E3: Maintaining employment capacity and improving employment floorspace)
- The deletion of Site A34: Broadford Business Park as a residential site allocation contributing to the inability of Guildford Borough Council to meet objectively assessed housing need, including unmet need, in full.

On the basis of the above and evidence contained in the attached reports, our client considers the Proposed Submission Local Plan to be unsound and fail the tests of paragraph 182 of the NPPF and associated guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Commercial Viability Report July 2017 plus app.pdf (5.0 MB)
- Broadford Business Park - Sequential Test.pdf (63 KB)
- 170724 - Broadford Business Park Reg 19 Reps (FINAL).pdf (704 KB)

Comment ID: pslp172/2684  Respondent: 17343585 / Andrew Dawson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I wish to object to the 2017 Proposed Submission of the Local Plan (Strategy and Sites) for the following reasons.

1. Policy P3 - Countryside

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- 4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the
remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

2. Policy A29: Land to the south and east of Ash and Tongham

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

2. Policy A29: Land to the south and east of Ash and Tongham (Cont.)

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

3. Policy A28: Land to the east of White Lane, Ash Green

- Correct title of Policy A28 to say Ash Green, and not Ash.

- Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site.”
• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

Attached documents:

---

**Comment ID:** pslp172/2689  **Respondent:** 17344129 / E.A. Stutchbury  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/5212  **Respondent:** 17344385 / Alan Broadley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

1. **Policy A29: Land to the south and east of Ash and Tongham (Cont.)**
“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3280  Respondent: 17344385 / Alan Broadley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[text of attachment reproduced below]

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- 3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3114  Respondent: 17344801 / Graham Rendell  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally the proposed development on the Wisley Airfield would I think put just as much strain on the area as the Garlick’s Arch plan. Particularly the increase in traffic and impact on local facilities. It would obviously put major pressure on the small back roads into Cobham which I believe would make those small roads extremely dangerous. An increase in traffic through Ripley would cause massive congestion not seen since before the Ripley By-Pass was built - yes I am old enough to remember those times - with again an increase in air pollution and a decrease in air quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2942  Respondent: 17344801 / Graham Rendell  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because again this could also radically change the drainage in the area.

Many of my previous points also are reliant to this plan including the increase in traffic and more erosion of the greenbelt.

Given that so many objections were made to the previous plan it seems that by increasing the size of the development with this plan you are totally ignoring the wishes of the local community.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2941  Respondent: 17344801 / Graham Rendell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because a development of this size would put massive strain on the local infrastructure. For example it is already difficult to get an appointment at the local doctors in the Village health Centre and as far as I know there are no NHS dentist places available.

I would be concerned about the amount of traffic not just caused by people going to work and congesting the various access roads but also the total volume of cars in the area filling car parks. It is already difficult to park in the Cobham and Guildford public car parks and even the private super stores in Cobham and Ladymead are often full to capacity. An overall increase in traffic in the area is bound to increase in air pollution decrease in air quality which I think is in direct conflict with government policy.

I thought the point of the GREEN BELT was to stop the complete urbanisation of our country areas. It seems to me the Garick's Arch development will effectively join up the existing communities into one mass of houses.

I have no first hand experience of the schools in the area but I assume that a new school would need to be provided. With those students coming from this new estate would isolate them from the wider community.

As for the inclusion of Travelling Show people plots I am left dumfounded as to why greenbelt land should be ruined in this way.

Another personal issue of concern I have is that of the interference with land drainage. My property was one of those flooded around 2001. An excellent flood prevention scheme was installed which seems to have prevented further flooding. However, given the flood water came from this proposed ares I am very concerned that altering the use of this land will upset the drainage and once again put our properties in danger.

Finally the proposed development on the Wisley Airfield would I think put just as much strain on the area as the Garlick’s Arch plan. Particularly the increase in traffic and impact on local facilities. It would obviously put major pressure on the small back roads into Cobham which I believe would make those small roads extremely dangerous. An increase in traffic through Ripley would cause massive congestion not seen since before the Ripley By-Pass was built - yes I am old enough to remember those times - with again an increase in air pollution and a decrease in air quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3112  Respondent: 17344801 / Graham Rendell  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch because a development of this size would put massive strain on the local infrastructure. For example it is already difficult to get an appointment at the local doctors in the Village health Centre and as far as I know there are no NHS dentist places available.

I would be concerned about the amount of traffic not just caused by people going to work and congesting the various access roads but also the total volume of cars in the area filling car parks. It is already difficult to park in the Cobham and Guildford public car parks and even the private super stores in Cobham and Ladymead are often full to capacity. An overall increase in traffic in the area is bound to increase in air pollution decrease in air quality which I think is in direct conflict with government policy.

I thought the point of the GREEN BELT was to stop the complete urbanisation of our country areas. It seems to me the Garick's Arch development will effectively join up the existing communities into one mass of houses.

I have no first hand experience of the schools in the area but I assume that a new school would need to be provided. With those students coming from this new estate would isolate them from the wider community.

As for the inclusion of Travelling Show people plots I am left dumfounded as to why greenbelt land should be ruined in this way.

Another personal issue of concern I have is that of the interference with land drainage. My property was one of those flooded around 2001. An excellent flood prevention scheme was installed which seems to have prevented further flooding. However, given the flood water came from this proposed ares I am very concerned that altering the use of this land will upset the drainage and once again put our properties in danger.

I object to the Policy A42 change at Clockbarn in Tannery Lane because again this could also radically change the drainage in the area.

Many of my previous points also are reliant to this plan including the increase in traffic and more erosion of the greenbelt.

Given that so many objections were made to the previous plan it seems that by increasing the size of the development with this plan you are totally ignoring the wishes of the local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A 58 at Burnt Common because of many of the previous points above but also because it was already dropped from the 2014 draft and nothing as far as I can see has changed. There still seem to be empty units in Guildford such as the Slyfield estate.

More importantly it seems the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough. So why should this plan suggest an INCREASE of 10 hectares in the Green belt in Send?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I also object to Policy A58 at Burnt Common because:
• It was deleted from the 2014 draft because of all the objections made previously.
• The word 'minimum' is a change from the previous 'maximum' in the 2016 plan and since that time there has been a decline in demand for industrial land.
• There is no need to build industrial or warehouse development in the middle of Green Belt when Slyfield and Guildford still have empty site and industrial units.
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 ha. for industrial land for the whole borough, not a huge over-allocation of 10 ha. at Send in the Green Belt.
• The impact on small surrounding roads will create traffic gridlock.
• It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5177  Respondent: 17345441 / Thakeham Homes (Sarah Sutcliffe)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Proposed Submission Local Plan (Regulation 19) – Representation
Re: Land north of Grange Road, Ash

Introduction

These representations are submitted in respect of Thakeham Homes’ interests north of Grange Road, Ash (‘the site’). The site is also known by LAA reference 2247, and is included within the proposed strategic allocation ‘Policy A29: Land to the South and East of Ash and Tongham’. A red line location plan for the site is appended to this representation at Appendix 1.

We confirm within these representations that the site is available and deliverable within the first 5 years of the plan period and that it is set within a highly sustainable location. As such, we wish to make representations on the policies contained within the Proposed Submission Local Plan as detailed below, and the proposed strategic allocation: Policy A29.

We wish to support the progression of the Local Plan and make comments within our representations on the basis that the proposed housing numbers should be increased in line with the requirements of the National Planning Policy Framework (NPPF) to meet the full, objectively assessed housing needs of the Borough.

Land north of Grange Road, Ash

Thakeham Homes recommended the site for residential development and as such supports the inclusion of the site within the housing allocation, Policy A29: Land to the South and East of Ash Tongham’ in the Proposed Submission Local Plan. The red line for the site has been appended to this representation in Appendix 1.

Policy A29: Land to the south and east of Ash Tongham

Since the publication of the Pre-Submission Local Plan, the Council have made a number of amendments to Policy A29.

[Figure 1]

Site Area

As above, we support the inclusion of the site within Policy A29 for residential development. However, we note that the entirety of our site as actively promoted, does not fall within the proposed allocation, with a small part falling just outside. There is no evidence or justification to support the omission of this area from the allocation, and we would therefore suggest this may be in error. A site location plan can be found in Appendix 1, and we would request that the Council revise the proposed boundary shown in Policy A29 to reflect the site area for Land north of Grange Road, Ash, as promoted.
Policy A29: Requirement 9

The Council have sought to delete Policy A30: Land for new road bridge and footbridge scheme to enable a level crossing closure on A323 Guildford Road, adjacent to Ash railway station, Ash. Instead the Council have now sought to combine this with Policy A29, inserting requirement 9.

Thakeham Homes objects to Requirement 9 as there is no evidence or justification to support a new road bridge. On this basis the policy is unsound as it is not based on objectively assessed infrastructure requirements in accordance with NPPF, para 182.

The proposed wording of Requirement 9 states:

“Land and provision of a new road bridge which will form part of the A323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the A323 Guildford Road, adjacent to Ash railway station”

The objection is made on the following basis:

• **The assessment work to produce a technical justification to support this policy has not yet been undertaken.** There needs to be a fit-for-purpose assessment of future year operation of the level crossing without and with development. There is therefore currently no identification of whether the cumulative impact of development on the level crossing will be ‘severe’ or not (ref: para 32 of the NPPF). It has not been demonstrated that a road bridge option would offer any real benefit in terms of reducing journey times or queue lengths on the A323 Guildford Road.

• **Alternative options have not been tested.** Alternatives to a new road bridge could include for example traffic management, a footbridge only solution or improvement of alternative routes etc. The assessment of options needs to consider the alternatives to a road bridge and the benefits of each option weighed against their costs.

• **The feasibility of a new road bridge has not been proven in engineering terms.** This needs to be demonstrated, as does the practicality of timeliness of delivery given the need to cross a live rail line.

• **No consideration has been given to the cost effectiveness of the solution.** It is understood that the level of developer contribution is likely to run to circa £12,000 per dwelling - an unprecedented level of transport contribution, which could potentially jeopardise the delivery of other elements of development in Ash such as affordable housing.

**Infrastructure Delivery Plan (IDP)**

In relation to Policy A29 The Infrastructure Delivery Plan (IDP) references the following policies:

• LRN9: A323 Ash Road and Guildford Road (Ash) traffic management and environmental improvement scheme

• LRN11: B3411 Ash Hill Road/A323 Guildford Road (Ash) junction improvement scheme

Impacts in these locations are already apparent and in the future, are related to strategic growth. The funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.

Thakeham Homes objects to IDP Policy LRN21 ‘New road bridge and footbridge scheme to enable level crossing closure on A323 Guildford Road adjacent to Ash railway station’ for the reasons set out above.

Notwithstanding this objection, it is noted that pressure on this crossing is likely to come about not only as a result of development, but also due to increased movements on the North Downs Line, and other changes to the local and strategic road network. GBC’s identified mitigation is not solely development related and as such the funding source should, for consistency with other infrastructure projects included in the IDP make an allowance for some funding to come via the Local Growth Fund.

**Inclusion of permitted sites.**
The amendments to Policy A29, seek to include additional sites within the allocation. This includes a number of sites which currently have planning permission. These permitted sites equate to almost 700 new homes, which is a significant proportion of the 1,750 dwelling requirement indicated in Policy A29.

It is our view that the Council has failed to provide sufficient evidence or justification to support the infrastructure requirements within Policy A29, and on this basis, we consider the requirement as set out is unsound and should be deleted from this policy.

**Availability, Suitability and Achievability**

Whilst we have concerns regarding Policy A29 as detailed above, we continue to support the inclusion of this site within the strategic allocation and can confirm that the site is Available, Suitable, Achievable, and therefore deliverable within the next 5 years.

**Availability**

The NPPG provides the following guidance in regard to considering whether a site is available for development:

“A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operation requirements of landowners. This will often mean that land is controlled by a developer or landowner who has expressed an intention to develop”

NPPG Paragraph 021 Ref. 3-020-20140306

As highlighted within this representation, the site is controlled by Thakeham Homes Ltd and we will be actively engaging with the Council over the coming months prior to submission of a Full planning application for residential development. Thakeham obtained Reserved Matters permission for the adjacent site to the north for the delivery of 26 dwellings (Planning application Ref: 16/P/00663) in December 2016, following the grant of Outline consent in December 2013.

Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and will be seeking to deliver circa 60 dwellings on the site with a view to commencing development on site at the earliest opportunity.

**Suitability**

The NPPG provides the following guidance when considering whether a site is suitable for development:

“Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability”

NPPG Paragraph 019 Ref. 019-20140306

The site is located on the eastern edge of Ash village and is within walking distance of the various local amenities of Ash High Street. The Ash and Tongham Urban Area falls on the top tier of the settlement hierarchy and is therefore considered to have a range of services and facilities to meet the needs of the existing community as well as providing key services for surrounding smaller villages. The site has good transport links, with a railway station within walking distance of the site, and there is good access to bus links from Grange Road on the south western corner of the site.

The site has been submitted to and included within the Land Availability Assessment and promoted to the Local Plan, which acknowledges its suitability for residential development.

It is therefore evident from the proposed allocation and the supporting evidence including the LAA, that the site is considered suitable for development within the meaning of the NPPG.

**Achievability**
In determining whether a site is achievable for development, the NPPF provides the following guidance:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period”

NPPG, Paragraph 021 Ref. 021-20140306

Given the acute housing need within the Borough and the proposed inclusion of the site within a strategic allocation in the Proposed Submission Local Plan, it is considered that there is a reasonable prospect of residential development being achieved on site by 2021.

As stated above, Thakeham has a proven track record for delivering schemes of a similar size and scale throughout Surrey, Sussex and Hampshire, and has the capacity to deliver the development of the site to provide much needed new homes within the first 5 years of the plan period.

**Deliverability**

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. As such, we consider that the site could provide much needed housing development within the plan period and support the proposed strategic allocation Policy A29: Land to the south and east of Ash Tongham (except for Requirement 9)

**Conclusions**

In conclusion, we consider that the reduction in OAN and consequently intended housing provision is unsound, and the Council has not provided the required justification for this reduction. In particular, the intention of Guildford Borough to not contribute to the unmet needs in the HMA is of particular concern, and we would suggest that GBC seek to accommodate the 83dpa shortfall to ensure the housing needs of the HMA are met.

We consider that some standards and requirements stipulated in the proposed policies are unjustified, and the Council should demonstrate how these conform with national policy and guidance. Where there is insufficient evidence to demonstrate a requirement for such policies, these should be deleted from the Local Plan.

As detailed above, we are actively promoting the site for residential development and we therefore support the inclusion of the site within the Strategic Allocation detailed within Policy A29. We do however object to Requirement 9 of Policy A29 as Thakeham considers there is no evidence or justification to support the proposed new road bridge. We therefore suggest that on this basis the policy is unsound as it is not based on objectively assessed infrastructure requirements in accordance with NPPF, para 182.

We have demonstrated within these representations that we consider the site to be achievable, suitable and available for residential development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: 2017 07 24 GBC LP Representations Land north of Grange Road, Ash.pdf (828 KB) 2017 07 24 GBC LP Representations Land north of Grange Road, Ash - Appendix 1.pdf (122 KB)
This policy includes requirements in regard to additional standards to meet carbon reductions. This requirement is not consistent with national policy, and therefore any additional standards such as those relating to carbon reduction in Policy D2 should not be included within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3272  
Respondent: 17345441 / Thakeham Homes (Sarah Sutcliffe)  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 stipulates a requirement for residential development sites of 25 units or more to deliver 10% of new homes meeting Building Regulations M4 (2) Category 2 standard ‘accessible and adaptable dwellings’ and 5% of new homes meeting Building Regulations M4 (3)(b) category 3 wheelchair user accessible dwellings standard.

We wish to object to Policy H1, as it is not considered that the Council has provided sound justification to support the stipulation of such standards. Planning Practice Guidance is clear that evidence is required to demonstrate need and viability prior to implementing these standards.

The 2017 SHMA provides some justification regarding the need for accessible homes indicating a projected increase in the number of people with a long-term health problem or disability, whilst also indicating a requirement for 8% of the housing need to cater for specialist housing for older persons, such as sheltered and extra care housing.

Whilst we generally support the delivery of residential units to meet the needs of the ageing population and those with health needs, there is little justification within the Council’s evidence base to support the level of 15% of properties meeting Building Regulations Parts M4 (2) and M4 (3). Whilst there is some need within the Borough, particularly for the needs of older people, there is little justification as to the whether all sites would be suitable for this need depending on size, location and need within a particular area.

The Policy also stipulates that 5% of units on development sites of over 100 homes or more to be made available for sale as self-build and custom housebuilding plots whilst there is an identified need. The Council needs to provide justification and evidence as to the suitability of applying this policy to all sites over 100 units, as it will need to be demonstrated that such a requirement is feasible in terms of size, location and need within a particular area.

We would suggest that this policy is unsound and should be deleted, however should the policy remain a degree of flexibility needs to be applied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3513  
Respondent: 17345441 / Thakeham Homes (Sarah Sutcliffe)  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy ID4: Green and Blue Infrastructure

Thakeham continues to object to the proposed designation of the site as ‘Open Space’ and the findings of the Council’s Assessment of Sites for Amenity Value 2017 (Document Reference T16), which has informed this designation.

Open Space is defined in the NPPF as follows:

“All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity”

NPPF, Page 54

With respect to open space designations in the Proposed Submission Plan, Policy ID4 states:

‘Open space (encompassing all open space within urban areas, land designated as Open Space on the Policies Map and all land and water that provides opportunities for recreation and sport as identified in in the most recent Open Space, Sports and Recreation Assessment) will be protected from development in accordance with national planning policy.’

Supporting Paragraph 4.6.49 provides a definition of Open Space:

‘Open space for the purpose of policy ID4, is defined as all types of open land, both public and private, of public sport/ recreation and/or amenity value.’

Within the ‘reasoned justification’ for this policy at paragraph 4.6.55 of the Proposed Submission Local Plan, the Council explain that the Amenity Assessment 2017 has identified and informed the designation of Open Spaces across the Borough:

‘The Council has produced an Amenity Assessment to identify open spaces of public amenity value within villages that are inset from the Green Belt by the plan. This assessment looked at land within the proposed village inset boundaries, excluding land where inset boundaries were expanded to take in allocations on the edges of villages. Sites that were assessed as having public value are identified as Open Space on the Policies Map and will be protected in line with national planning policy to ensure that the value for which the space has been identified is retained. Open spaces outside inset village boundaries are protected by the Green Belt designation so have not been considered for further protection. Land of public value in inset villages that is used for sport and recreation is identified through the Open Space Sport and Recreation Assessment and will be protected in line with the NPPF.’

Following a site visit and basic desktop assessment, the Amenity Assessment 2017 deemed the site (Ref: ETH_088) had an amenity value score of ‘High’, accompanied by the following reasoning:

‘Site is a grass field which is inaccessible to the public. The site is adjacent to a private sports centre. There is also a PROW along the southern boundary. The site is in an elevated position and offers aesthetic value.’

As the site is private land which is inaccessible to the public and therefore has no amenity value with respect to providing opportunities for sports and recreation, it appears that the site has been designated entirely due to its ‘aesthetic value’ and that as a result the overall amenity value is scored as ‘High’. This is the only basis upon which the site is designated an Open Space within the Pre Submission Local Plan under Policy I4.

The site is well contained by high hedgerow to its southern boundaries adjacent to the public footpath, and is set substantially back from the road frontage of Chinthurst Lane. Due to the location and positioning of the site, there are very limited views towards the site from the public realm on Chinthurst Lane and further afield. The elevated position of the site means any views into the site from the tennis club are limited. The only views into the land are from private properties at first floor level, and limited views from the private sports club.
As per previous representations, and to demonstrate the minimal visual amenity value of this site, we have again appended a series of images at Appendix 2 which accompanied representations made in July 2016. These images show that the site is not visible from the public footpath, with the exception of over the entrance gate, and that there is very limited visibility towards the site from the public realm on Chinthurst Lane or the sports club.

We object to the conclusion within the Amenity Assessment that this site is of high amenity value and we consider that the proposed allocation of the land as Open Space should be removed from the Local Plan.

The designation of sites of no amenity value is not consistent with the NPPF and does not constitute positive planning and would seriously compromise the ability of the Borough to provide much needed housing in sustainable locations within the villages and towns.

For the reasons above, it is our view that the Council should review the evidence base, including the Amenity Assessment, and that the proposed Open Space allocation affecting this site should be removed to ensure that the plan reflects national planning policy.

This site is set within a highly sustainable location in the village, and would be suitable for residential development in the emerging plan period. Sites such as this within the village envelope can make an important contribution to meeting housing needs in the locality.

Availability, Suitability & Achievability

Availability

The NPPG provides the following guidance in regard to considering whether a site is available for development:

“A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operation requirements of landowners. This will often mean that land is controlled by a developer or landowner who has expressed an intention to develop”

NPPG Paragraph 021 Ref. 3-020-20140306

As highlighted within this representation, the site is controlled by Thakeham Homes Ltd and we wish to actively engage with the Council over the coming months prior to the submission of a full planning application for residential development.

Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and will be seeking to deliver circa 20 dwellings on the site with a view to commencing development on site at the earliest opportunity.

Suitability

The NPPG provides the following guidance when considering whether a site is suitable for development:

“Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability”

NPPG Paragraph 019 Ref. 019-20140306

The site lies within the village of Shalford which is proposed to be inset from the Green Belt. The site is surrounded by existing residential and commercial development on all of its boundaries. There are a number of services and facilities in the local area, including a railway station and an infant school. Physical constraints to development in this location are also minimal. The site lies comfortably within Flood Risk Zone 1, where there is considered to be the lowest level of fluvial flood risk. There are no major ecology constraints and the site lies a significant distance from the Thames Basin Heaths SPA.

Achievability
In determining whether a site is achievable for development, the NPPF provides the following guidance:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period”

NPPG, Paragraph 021 Ref. 021-20140306

Given the acute housing need within the Borough and the relative lack of constraints affecting this site, it is considered that there is a reasonable prospect of residential development being achieved on site by 2021.

As stated above, Thakeham has a proven track record for delivering schemes of a similar size and scale throughout Surrey, Sussex and Hampshire, and has the capacity to deliver the development of the site to provide much needed new homes within the first 5 years of the plan period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3512</th>
<th>Respondent: Thakeham Homes (Sarah Sutcliffe)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value**

We note the extension of the existing AGLV boundary within the Proposed Submission Local Plan resulting in this policy now ‘washing over’ the settlement. We do not consider that this is appropriate use of AGLV policy, as there is no justification to support the application of this designation across the settlement. We would suggest that the areas within the settlement boundary do not perform the required function to warrant designation as AGLV. We consider that the AGLV designations within settlement boundaries should be reviewed and omitted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/3274</th>
<th>Respondent: Thakeham Homes (Sarah Sutcliffe)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
We have concerns regarding the proposed Policy S2: Borough Wide Strategy for the plan period, as the reduction in housing provision has not been properly justified and the council has failed to consider the needs of neighbouring authorities.

Since the publication of the Pre-Submission Local Plan in June 2016, Guildford Borough Council (GBC) has reduced the overall housing target for the plan period from 13,860 to 12,426, this policy also includes an amendment to the plan period from 2013 - 2033 to 2015 - 2034. GBC has sought to justify this by citing an adjustment in OAN resultant of changes in projected economic forecasts within the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 (‘2017 SHMA).

Affordability & Market Signals

The council suggests that economic circumstances point to a reduced need for housing, however affordability issues and the demographic baseline detailed in the 2017 SHMA point towards a difference conclusion. The baseline figure alone in the 2017 SHMA shows an increase in housing need in the borough from 517 dpa to 552 dpa. This clearly demonstrates significant growth in housing need from 2015-2017.

The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of those is the need to take into account market signals, such as land prices and housing affordability. Whilst Paragraph 19 of the NPPF stipulates that housing need numbers should be adjusted to reflect appropriate market signals.

Whilst the 2017 SHMA assesses market signals, concluding that an uplift should be applied in terms of housing need, the uplift which has been applied is very low. The 2017 SHMA moves from an employment-led OAN of 579dpa to 631dpa (+52dpa) through ‘improvements to affordability’. The 2017 SHMA outlines that this is a 9% increase on the employment led projections (paragraph 8.17 refers).

The 2017 SHMA draws on the lower quartile affordability ratio prepared by DCLG (Figure 14 refers). This indicates that in Guildford Borough, the lower quartile houses are 11.4 times that of lower quartile (LQ) earnings. The Office for National Statistics (ONS) have now taken care of this data and have produced workforce based lower quartile affordability ratios using data up to 2016. This indicates that the LQ affordability ratio has increased to 12.18 in 2016. If we compare that to the national picture in 2016 of 7.16, it is clear that Guildford has severe affordability issues and an imbalance in the supply and demand of housing. This may, in part, be due to the restricting presence of the Green Belt, however it is the preserve of the Council to ensure that affordability is addressed through the Local Plan to enable the OAN to be met in full and alleviate affordability concerns throughout the plan period.

The councils evidence base clearly demonstrates affordability issues within the borough, and whilst it is concluded within the 2017 SHMA that an uplift should be applied, this is insufficient at present to contribute towards improving affordability within the borough and the wider HMA.

In terms of affordable housing, the 2017 SHMA indicates that the need for affordable housing in the Borough has increased from 478dpa to 517dpa (Table 24 refers). Based on affordable delivery of 40%, this indicates that the Council would need to provide up to 1,300dpa in order to meet the affordable need in full. Whilst this is clearly a significant figure to address, the Council has not made any attempts to provide additional growth to meet a greater element of this need. It would appear that a proportionate approach is needed to ensure that the Council makes every effort to reduce the disparity between affordable housing need and supply.

Duty to Cooperate & Unmet need

The NPPF duty to cooperate requires LPAs to demonstrate evidence of having effectively cooperated to plan for cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area. Providing a requirement for Local Plans to seek to deliver ‘the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development’.

The Council’s evidence base fails to assess the potential for meeting unmet needs arising from outside the Borough. The Council only seeks to provide housing for its own assessed need.
Guildford falls within the West Surrey Housing Market Area (HMA) which comprises of 3 Local Authorities: Woking, Waverley and Guildford Borough Councils. Importantly, the current Waverley Local Plan examination has raised key issues in regard to Woking’s unmet need, and the need for clarity on how this is to be addressed through the wider HMA. It was determined at the Waverley examination hearings that they would be expected to meet half of the unmet need arising from Woking, amounting to 83dpa.

Given that paragraph 4.1.9a of the Proposed Submission Local Plan states that the housing requirement ‘is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period’. We consider that Guildford has sufficient capacity to ensure that they can make a significant contribution to the remaining unmet need of Woking, in addition to their own OAN and consequently this should be reflected in their housing requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3511  Respondent: 17345441 / Thakeham Homes (Sarah Sutcliffe)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Guildford Borough Proposed Submission Local Plan (Regulation 19) – Representation
Re: Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford
Introduction

These representations are submitted in respect of Thakeham’s interest on land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford (‘the site’). The site is also known by LAA reference 1264, and has previously been promoted to the Local Plan, including to the Draft Local plan consultation in autumn 2014 and Pre-Submission Local Plan consultation in June-July 2016.

We wish to support the proposed insetting of Shalford within the Green Belt in the Proposed Submission Local Plan, however as per our representations submitted in July 2016 we wish to object to the proposed designation of this site as ‘Open Space’ and the findings contained within the Amenity Assessment, which in our view does not provide sufficient justification for this allocation.

Land to the rear of Greenhill and Burnside, Chinthurst Lane, Shalford

Thakeham Homes wishes to recommend the site for residential development and as such supports the indicated changes to inset Shalford into the Green Belt in the Proposed Submission Local Plan. The red line location plan for the site has been appended to this representation at Appendix 1.

[Figure 1]

Deliverability

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. In summary, we consider that this site has limited amenity value and object to the proposed designation of the site as open space. The site is deliverable for residential development, and could be delivered within the first five years of the plan period.

Conclusions

In conclusion, we consider that the reduction in OAN and consequently intended housing provision is unsound, and the Council has
not provided the required justification for this reduction. In particular, the intention of Guildford Borough to not contribute to the unmet needs in the HMA is of particular concern, and we would suggest that GBC seek to accommodate the 83dpa shortfall to ensure the housing needs of the HMA are met.

We consider that some standards and requirements stipulated in the proposed policies are unjustified, and the Council should demonstrate how these conform with national policy and guidance. Where there is insufficient evidence to demonstrate a requirement for such policies, these should be deleted from the Local Plan.

As detailed above, we have actively promoted this site for residential development and are pleased that the Council has sought to inset the settlement from the Green Belt. We do however have concerns regarding the Councils application of both AGLV policy across the settlement and Open Space policy on the site. We do not consider that the site has been assessed correctly within the ‘Assessment of Site for Amenity Value 2017’ document, and recommend that the land to the rear of Greenhill and Burnside, Shalford, is removed from Policy ID4 as open space due to its limited amenity value and private ownership.

We have also demonstrated within these representations that we consider the site to be achievable, suitable and available for residential development.

We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Document</th>
<th>Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017_07_18_GBC_LP_Representations_Land_to_the_rear_of_Greenhill_and_Burnside_Appendix_1.pdf</td>
<td>(382 KB)</td>
</tr>
<tr>
<td>2017_07_18_GBC_LP_Representations_Land_to_the_rear_of_Greenhill_and_Burnside_Chinthurst_Lane_Shalford.pdf</td>
<td>(854 KB)</td>
</tr>
<tr>
<td>2017_07_20_GBC_LP_Representations_Land_to_the_rear_of_Greenhill_and_Burnside_Appendix_2.pdf</td>
<td>(411 KB)</td>
</tr>
</tbody>
</table>

Comment ID: pslp17q/666  Respondent: 17345441 / Thakeham Homes (Sarah Sutcliffe)  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

NPPF, para 182 sets out the requirements for a Local Plan to be found ‘sound’. We believe that the Local Plan is currently unsound as it stands on the basis that:

- The Local Plan is not positively prepared, as it fails to meet objectively assessed development requirements, including unmet requirements from neighbouring authorities;
- The Local Plan is not effective as it is not based on effective joint working on cross-boundary strategic priorities;
- The Local Plan is not consistent with national policy, particularly in relation to NPPF, para 14. The reduction in housing provision in Policy S2 demonstrates that the Council is not positively seeking opportunities to meet development needs.

We consider that some standards and requirements stipulated in the proposed policies are unjustified, and the Council should demonstrate how these conform with national policy guidance. Where there is insufficient evidence to demonstrate a requirement for such policies, these should be deleted from the Local Plan.
We consider Guildford Borough Council’s revised Proposed Submission Local Plan to be unsound because it is not consistent with National Policy, sustainable or justified.

We strongly object to proposals to release Green Belt land on the following grounds:

- The Green Belt sites proposed for development still meet the requirements as set out in the paragraphs on Green Belt purposes in the National Planning Policy Framework (NPPF) and their removal would compromise the integrity of the London Metropolitan Green Belt.
- Notwithstanding the changes made to the Local Plan since the 2016 consultation, proposals to release large areas of Green Belt for development are inconsistent with the NPPF and with stated Government policy, as stated by the Secretary of State for Communities and Local Government.

The following points outline the reasons why we consider the Proposed Submission Local plan to be unsound and relate to the following policies:

- A25: Gosden Hill Farm
- A26: Blackwell Farm
- A35: Former Wisley Airfield
- A43: Garlick Arch
- A43a: Land for new north facing slip roads to/from A3 at Send Marsh/ Burnt Common
- E4: Surrey Research Park
- H2: Affordable Homes
- P2: Green Belt

1. The plan is inconsistent with the NPPF.

1.1 Guildford Borough Council has still failed to prove that the benefit of releasing land within the Metropolitan Green Belt area outweighs the harm. Notwithstanding the changes made to the revised plan, it is quite clear that the harm of removing Green Belt land which strongly meets Green Belt criteria in paragraph 80 of the NPPF considerably outweighs any benefits. Guildford Borough Council has failed to take account of the significant harm of releasing Green Belt for development, despite there being a clear environmental and social impact for both the residents of Guildford Borough Council and neighbouring authorities.
Paragraph 44 of The Planning Practice Guidance states that:

*The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies ... Such policies include ... land designated as Green Belt."

- 1.2 Proposed Green Belt development undermines the Green Belt’s purposes, in particular, checking unrestricted urban sprawl, preventing the merger of neighbouring towns and assisting urban regeneration.

Guildford Borough Council’s revised Proposed Submission Local Plan proposes to build in excess of 7000 homes on Green Belt land, approximately 58% of its total housing target. The proposed urban extensions at Blackwell Farm (Policy A26) and Gosden Hill Farm (Policy A25) are on sites particularly vital to prevent urban sprawl and are of strategic importance to the Metropolitan Green Belt in its entirety. These sites also include high grade agricultural land as well as land significant for recreation which contributes to Surrey’s iconic landscape including Hogs Back.

- Gosden Hill Farm (Policy A25)
  This site performs all the functions of the Green Belt but particularly prevents the merger of neighbouring towns by separating West Clandon from the edge of urban Guildford. Notwithstanding the changes in the revised plan, the proposals would cause the coalescence of the two towns. Along with the proposal for on-slip and offslips roads at Garlick’s Arch (policy A43a), this would lead to continuous development from Send to Guildford.
- Blackwell Farm (Policy A26)
  Blackwell Farm is of strategic importance for the whole of the Metropolitan Green Belt. It performs all five functions of Green Belt, and fulfils purposes 1, 3 and 5 very strongly. It clearly prevents urban sprawl to the West of Guildford and protects the countryside (including AONB) from incursion. Furthermore, the revised plan disregards an independent expert landscape study, which demonstrates that part of The site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review.
- Land at former Wisley Airfield (Policy A35)
  This land plays a significant role in curtailing urban sprawl. In rejecting previous planning applications on this site, Guildford Borough Council Planning Officers themselves stated that development would be inappropriate due to the impact on the openness of the land.

The Proposed Submission Local Plan is unsustainable

2.1. Focusing housing development on Green Belt land makes the Local Plan’s affordable Housing Policy unachievable.

The changes in policy H2 Affordable Homes do not go far enough to address affordable or social housing need. By continuing to concentrate housing development on Green Belt rather than urban sites, the revised Proposed Submission Local Plan renders the 40% affordable target stated in the Local Plan’s Affordable Homes Policy unachievable.

As mentioned in 3.2 below, the fact that Guildford Borough Council has failed to set higher densities for the urban area and has deleted all reference to “density for development” in its revised Local Plan means that the plan is out of step with current policy direction and is therefore unsustainable.

2.2 Development at Garlick Arch (Policy A43) would lead to the loss of rural employment
Notwithstanding the changes made in the revised plan, Policy A43 does not mitigate the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over nine years.

2.3. Development on Green Belt sites will increase traffic congestion, significantly impact on air quality and lead to flooding

The development proposed on Green Belt sites is dependent on large, uncommitted road building schemes; will have a detrimental impact on traffic volume and associated air quality as well as increasing flood risk.

- Gosden Hill Farm (Policy A25)
  The volume of traffic will greatly increase air pollution by:
  - Generating approximately 6,000 vehicles which will exit straight on to the already heavily congested road network;
  - The linking of the A3100, B2215 and A247, channelling thousands of cars through the narrow, winding road through West Clandon;
  - The proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common which would generate even larger volumes of on the A247 through Send and West Clandon.

- Blackwell Farm (Policy A26) and Surrey Research Park (Policy E4)
  The development will heighten the risk of flooding and the volume of traffic will add to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrogen Dioxide as a result of:
  - Damaging Hogs Back’s function as a soak away for surface rainwater - development on Blackwell Farms slopes will cause water to travel north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common;
  - Directing more office space to an extended business park [Policy E4] which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas;
  - ignoring independent expert traffic studies which show the impact of development at Blackwell Farm on the local network, questioning the viability of the development;
  - removing Guildford’s “green lung” on the slopes of the Hogs Back. In the UK, the prevailing winds are from the West. The open farmland to the west of Guildford allows clean air to be blown into the town. If this area is urbanised, CO2 emissions and other pollutants will replace this clean air.

- Land at former Wisley Airfield (Policy A35)
  This development would cause further harm to air quality both onsite and in the Cobham Air Quality Management Area due to the proximity to the severely congested A3/ M25 junction and Ripley village and roundabouts.

3. The Proposed Submission Local Plan is unjustified.

3.1. Green Belt should have been considered as a constraint when setting housing targets but, notwithstanding the changes made since the 2016 consultation, this has not happened.

The revised Proposed Submission Local Plan is not compliant with national policy as, notwithstanding the changes made since the 2016 consultation, it still does not take sufficient account of Green Belt constraints on development. The reduction in the housing target by just 1,434 from 13, 860 to 12,426 means that the changes do not sufficiently take account of constraint. This is in direct contrast to the Secretary of State’s 2016 statement that Green Belt should be ‘absolutely sacrosanct’.
Paragraph 45 of the Planning Practice Guidance clearly states that councils should take account of policies such as the Green Belt which indicate development should be restricted.

"Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

The government has also repeatedly made it clear that demand for housing is unlikely to be accepted as the exceptional circumstances needed to justify changing Green Belt boundaries for example in ministers’ clarifications in letters to MPs, referring directly to the Local Plan preparation process: “we have been repeatedly clear that demand for housing alone will not change green belt boundaries” [Letter from Brandon Lewis to MPs 7 June 2016]. Guildford Borough Council is clearly justifying the release of Green Belt by arguing it is needed for housing, however as mentioned in 2.1, this is unsustainable in providing the housing needed and thus cannot warrant exceptional circumstances.

3.2 Local Plan revisions do not taken account of the policy intentions set out in the Housing White Paper, published following the original Regulation 19 consultation.

The Housing White Paper, published after the previous Regulation 19 consultation, made it explicit that Local Authorities must look at ALL alternatives before releasing Green Belt land including increasing density and making the most of available brownfield sites. Previous consultations show that Guildford residents would prefer to use brownfield land in the urban area first.

The revised Local Plan is thus unjustified because it fails to fully explore the many opportunities within the borough where there is no presumption against development which would mitigate the release of Green Belt land AND assist in urban regeneration.

- **Densification**
  - More effective use of current space would remove the need for new land.
  - Urban densities in Guildford town are no higher than the villages that surround it despite the majority of villages being in the Green Belt and protected from development.
  - Only 10% of the total housing proposed in the revised Local Plan is proposed in Guildford Town Centre. The fact that Guildford Borough Council has failed to set higher densities for the urban area and has deleted all reference to “density for development” in the revised Local Plan means that the plan is out of step with current policy direction and unsustainable.
  - The existing Surrey Research Park is low density with just 65,000m² of office space over 27 ha. This land could be used far more effectively by providing office space on car parks and other mixed use development.
  - If the plot-ratio in the approved Manor Park master plan was applied to the existing Research Park, six times as much office accommodation could be provided therein.

- **Brownfield**
  - Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities as nearby towns such as Woking.
  - Sites by River Wey could be used to provide affordable accommodation where it is needed rather than unnecessary retail development. The Carter Jonas Guildford Retail Study Update 2017 lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take
account of changing retail patterns in relation to the decline in high street retail due to the rise of internet shopping. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford.
- The plan overlooks Bordon and Whitehill eco-town which is seeking high quality businesses to re-locate.

Moreover, the Housing White Paper also sends a clear signal to developers that they must build out permissions. The University of Surrey was permitted to remove 64 ha of land from The Green Belt at Manor Park in 2003 citing the need to build 5090 student and staff residences as exceptional circumstances. 14 years on, only one third of these have been built yet the university has claimed that students want to live off-campus, now referring to Guildford’s acute housing need as an exceptional circumstance to build on Blackwell Farm (Policy A26).

3.2 The proposal to extend Surrey Research Park onto Green Belt land at Blackwell Farm does not constitute exceptional circumstances. The excessive expansion of Surrey Research Park (Policy E4) onto Green Belt land at Blackwell Farm is not supported by the findings of the Employment Land Needs Assessment 2017. The current site is very low density and could easily be increased within its existing curtilage.

4. Proposed modifications.
   a. Revise housing targets to a more credible level, taking into account the Green Belt as a constraint to development. The London Green Belt council concurs with the Guildford Green Belt Group that a target of 4,000 homes would remove the need to build on Green Belt or open countryside, meeting the largest public objection to the plan as a whole.
   b. Instigate a more sustainable alternative to meeting housing need by following government policy to develop on previously developed sites in the urban area, many of which are owned by the Council.
   c. Include far more affordable housing to meet the need for young families and young people in the Guildford area.
   d. Impose a moratorium on any development proposed on University of Surrey Green Belt land until it has completed all the developments proposed in its 2003 Manor Farm proposal.
   e. Increase the Surrey Research Park plot ratio from 25% to 50% to keep development within the same footprint of the existing park without damaging its amenity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/360</th>
<th>Respondent:</th>
<th>17348225 / Thakeham Homes (Katherine Munro)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Shalford (north)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>is Legally Compliant?</strong></td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Land to the East of Chinthurst Lane, Shalford
As set out in previous representations (dated 29th November 2013 and 18th July 2016), Thakeham Homes wishes to recommend the site for residential development and as such supports the changes to inset Shalford from the Metropolitan Green Belt. Albeit we consider that the settlement boundary could be extended to include this site to provide much needed housing towards addressing the Borough’s objectively assessed needs. The red line location plan for the site has been appended to this representation at Appendix 1.

The site is located adjacent to the proposed inset settlement boundary East of Chinthurst Lane. As such, the site is set within a sustainable location, within walking distance of many local services and facilities, including a railway station and an infant school. Physically, the site benefits from minimal constraints, with a flat topography and good screening provided.
by trees, offering limited views in from the surrounding area. The site is located within flood risk zone 1, where there is considered to be the lowest risk of fluvial flooding.

This site is set within a highly sustainable location on the edge of the village, and would be suitable as an extension to the existing built area to provide much needed housing to meet the Borough’s needs.

The site is identified as a Potential Development Area (PDA) in the Green Belt and Countryside Study Volume III (2013) (ref: E56-A). Within the assessment it notes that “the site is surrounded by defensible boundaries including hedgerows and woodland at Shalford Common to the north, hedgerows and rising topography to the east and south, and hedgerows following Chinthurst Lane to the west of the PDA”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1208  Respondent: 17348225 / Thakeham Homes (Katherine Munro)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2: Sustainable design, construction and energy

This policy includes requirements in regard to additional standards to meet carbon reductions. This requirement is not consistent with national policy, and therefore any additional standards such as those relating to carbon reduction in Policy D2 should not be included within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1207  Respondent: 17348225 / Thakeham Homes (Katherine Munro)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H1: Homes for all
We wish to object to Policy H1. Policy H1 has been amended and now stipulates a number of additional onerous
requirements for residential development, including the requirement for sites of 25 units or more to deliver 10% of new
homes meeting Building Regulations M4 (2) Category 2 standard ‘accessible and adaptable dwellings’ and 5% of new
homes meeting Building Regulations M4 (3)(b) category 3 wheelchair user accessible dwellings standard. Planning
Practice Guidance is clear that evidence is required to demonstrate need and viability prior to implementing these
standards.

The 2017 SHMA provides some justification regarding the need for accessible homes indicating a projected increase in the
number of people with a long-term health problem or disability, whilst also indicating a requirement for 8% of the housing
need to cater for specialist housing for older persons, such as sheltered and extra care housing.

Whilst we generally support the delivery of residential units to meet the needs of the ageing population and those with
health needs, there is little justification within the Council’s evidence base to support the level of 15% of properties
meeting Building Regulations Parts M4 (2) and M4 (3). Whilst there is some evident need within the Borough, particularly
for the needs of older people, there is little justification as to the whether all sites would be suitable for this need depending
on size, location and need within a particular area.

The Policy also stipulates that 5% of units on development sites of over 100 homes or more to be made available for sale as
self-build and custom housebuilding plots whilst there is an identified need. Whilst there is a clear mandate for Local
Authorities to understand the scale and requirement for self-build properties to provide evidence for the demand for this
type of housing, the Council has not provided any justification for this policy. In the absence of credible evidence, the
policy needs to be made more flexible in order for self-build to be included in the plan, though not to the prescriptive extent
expressed in the current policy.

We would suggest that these aspects of the policy are unsound and should be deleted, however should the policy remain a
degree of flexibility needs to be applied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1206  Respondent: 17348225 / Thakeham Homes (Katherine Munro)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Borough Wide Strategy ‘Housing Provision’

One of the more significant changes presented in the Proposed Submission version of the Local Plan is the reduction in the
Objectively Assessed Need for Housing (OAN) presented as part of the emerging Policy S2. We object to these changes as
the reduction in housing provision has not properly justified and the Council has failed to consider the unmet need for
neighbouring authorities.

Since the publication of the Pre-Submission Local Plan in June 2016, Guildford Borough Council (GBC) has reduced the
overall housing target for the plan period from 13,860 to 12,426, this policy also includes an amendment to the plan period
from 2013 - 2033 to 2015 - 2034. GBC has sought to justify this reduction by citing an adjustment in OAN resultant of
changes in projected economic forecasts within the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 (2017 SHMA).

Affordability & Market Signals

The Council suggests that economic circumstances point to a reduced need for housing, however affordability issues and the demographic baseline detailed in the 2017 SHMA point towards a difference conclusion. The baseline figure alone in the 2017 SHMA shows an increase in housing need in the borough from 517 dpa to 552 dpa. This clearly demonstrates growth in housing need from 2015-2017.

Our view is that the 2017 SHMA does not properly reflect the affordability constraints in the Borough and fails to apply a sufficient uplift. The NPPF explains at Paragraph 17 that there are certain underlying principles which should be applied when assessing housing need. One of those is the need to take into account market signals, such as land prices and housing affordability. Whilst Paragraph 19 of the NPPF stipulates that housing need numbers should be adjusted to reflect appropriate market signals.

Whilst the 2017 SHMA assesses market signals, concluding that an uplift should be applied in terms of housing need, the uplift which has been applied is very low. The 2017 SHMA moves from an employment-led OAN of 579dpa to 631dpa (+52dpa) through ‘improvements to affordability’. The 2017 SHMA outlines that this is a 9% increase on the employment led projections (paragraph 8.17 refers). The 2017 SHMA draws on the lower quartile affordability ratio prepared by DCLG (Figure 14 refers). This indicates that in Guildford Borough, the lower quartile houses are 11.4 times that of lower quartile (LQ) earnings. The Office for National Statistics (ONS) have now taken care of this data and have produced workforce based lower quartile affordability ratios using data up to 2016. This indicates that the LQ affordability ratio has increased to 12.18 in 2016. If we compare that to the national picture in 2016 of 7.16, it is clear that Guildford has severe affordability issues and an imbalance in the supply and demand of housing. This may, in part, be due to the restricting presence of the Green Belt, however it is the preserve of the Council to ensure that affordability is addressed through the Local Plan to enable the OAN to be met in full and alleviate affordability concerns throughout the plan period.

The Council’s evidence base clearly demonstrates affordability issues within the Borough, and whilst it is concluded within the 2017 SHMA that an uplift should be applied, this is insufficient at present to contribute towards improving affordability within the Borough and the wider HMA.

In terms of affordable housing, the 2017 SHMA indicates that the need for affordable housing in the Borough has increased from 478dpa to 517dpa (Table 24 refers). Based on affordable delivery of 40%, this indicates that the Council would need to provide up to 1,300dpa in order to meet the affordable need in full. Whilst this is clearly a significant figure to address, the Council has not made any attempts to provide additional growth to meet a greater element of this need. It would appear that a proportionate approach is needed to ensure that the Council makes every effort to reduce the disparity between affordable housing need and supply.

Duty to Cooperate & Unmet need

The NPPF duty to cooperate requires LPAs to demonstrate evidence of having effectively cooperated to plan for cross-boundary impacts, including the delivery of housing development to meet the full objectively assessed needs of the area. Providing a requirement for Local Plans to seek to deliver ‘the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development’.

The Council’s evidence base fails to assess the potential for meeting unmet needs arising from outside the Borough. The Council only seeks to provide housing for its own assessed need.

Guildford falls within the West Surrey Housing Market Area (HMA) which comprises of 3 Local Authorities: Woking, Waverley and Guildford Borough Councils. Importantly, the current Waverley Local Plan examination has raised key issues in regard to Woking’s unmet need, and the need for clarity on how this is to be addressed through the wider HMA. It was determined at the Waverley examination hearings that they would be expected to meet half of the unmet need arising from Woking, amounting to 83dpa.

Given that paragraph 4.1.9a of the Proposed Submission Local Plan states that the housing requirement ‘is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan
period’. We consider that Guildford has sufficient capacity to ensure that they can make a significant contribution to the remaining unmet need of Woking, in addition to their own OAN and consequently this should be reflected in their housing requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/229</th>
<th>Respondent:</th>
<th>17348225 / Thakeham Homes (Katherine Munro)</th>
<th>Agent:</th>
</tr>
</thead>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Availability, Suitability & Achievability

Availability

The NPPG provides the following guidance in regard to considering whether a site is available for development:

“A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operation requirements of landowners. This will often mean that land is controlled by a developer or landowner who has expressed an intention to develop”

NPPG Paragraph 021 Ref. 3-020-20140306

As highlighted within this representation, the site is controlled by Thakeham Homes Ltd and we wish to actively engage with the Council to promote the site for the delivery of around 200 much needed homes.

Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and should the Council allocate the site for removal from the Green Belt, we would look to commence development on site at the earliest opportunity.

Suitability

The NPPG provides the following guidance when considering whether a site is suitable for development:

“Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability”

NPPG Paragraph 019 Ref. 019-20140306

The site lies adjacent to the settlement boundary of Shalford, which is proposed to be inset from the Green Belt within the Proposed Submission Local Plan. We support the proposed insetting of the village, and consider that this site could provide an extension to the built area to provide housing. The insetting of the settlement reflects the sustainability of the village and the suitability of the area as a location for some level of growth in the plan period.
As stated above, the site is set within a sustainable, edge-of-settlement location adjacent to the proposed settlement boundary and the Council’s Green Belt and Countryside Study Volume III (2013) notes that “the site is surrounded by defensible boundaries”.

We therefore consider that the site is suitable for the delivery of residential development and should therefore be removed from the Green Belt.

**Achievability**

In determining whether a site is achievable for development, the NPPF provides the following guidance:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period”

NPPG, Paragraph 021 Ref. 021-20140306

Given the acute housing need within the Borough and the relative lack of constraints affecting this site, it is considered that the site could deliver around 200 dwellings within the plan period.

As stated above, Thakeham has a proven track record for delivering schemes of a similar size and scale throughout Surrey, Sussex and Hampshire, and has the capacity to deliver the development of the site to provide much needed new homes within the plan period.

**Deliverability**

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. We have appended to this representation an indicative site plan without constraints to illustrate where development could potentially be delivered on the site.

**Conclusions**

In conclusion, we consider that the reduction in OAN and consequently intended housing provision is unsound, and the Council has not provided the required justification for this reduction. The intention of Guildford Borough to not contribute to the unmet needs in the HMA is of particular concern.

As demonstrated above, the Local Plan is not positively prepared, effective or consistent with national policy and therefore in accordance with NPPF, paragraph 182 is not ‘sound’.

We consider that some standards and requirements stipulated in the proposed policies are unjustified, and the Council should demonstrate how these conform with national policy and guidance. Where there is insufficient evidence to demonstrate a requirement for such policies, these should be deleted from the Local Plan.

As detailed above, we have actively promoted this site for residential development and are pleased that the Council has sought to inset the settlement of Shalford from the Green Belt. Notwithstanding this, it is our view that the Council should work proactively to identify and include additional housing site allocations in sustainable locations in the towns and villages and areas of least constraint to meet the full OAN for the HMA and provide sufficient flexibility to adapt to rapid change in accordance with NPPF, paragraph 14.

We have demonstrated within these representations that the Land East of Chinthurst Lane, Shalford, is available, suitable and deliverable for residential development. As such, we recommend that this site is allocated to assist with meeting the Borough’s housing land supply shortfall, as the site is deliverable within the first 5-years of the plan period and provides a sustainable location for residential development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

**Comment ID:** pslp17q/230  **Respondent:** 17348225 / Thakeham Homes (Katherine Munro)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection photos

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane Appendix 2.pdf (4.6 MB) 2016 07 18 GBC Pre Submission LP Representations Shalford East of Chinthurst Lane Appendix 1.pdf (1.3 MB)

**Comment ID:** pslp173/362  **Respondent:** 17350433 / Pat Perrin  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Normandy since 1976 having relocated from Kent. We eventually chose Normandy for all that it had to offer our family namely a beautiful rural setting surround by relatively open country side with nearby Guilford offering everything in the way of shopping, historical interest, leisure activities and good rail links into London.

I fully support:-

Removal of site A46

Approx 1100 housing units and large senior school

I wholeheartedly rejoice that this totally unacceptable proposal has been removed from the plan. The proposal to change open fields currently designated Green Belt and increase Normandy's population and housing density by over 100% and the the unproven need for a secondary school to be situated in Normandy was grossly inappropriate. Normandy residents are already suffering from higher than expected traffic congestion with large double length lorries using Glaziers Lane (GL)
to access the A31 and any traffic diversions when lanes on said A31 are closed, a very frequent occurrence. GL and Westwood Lane (WL) are country roads not designed to take this heavy traffic use without adding to what is already a problem for residents.

Another issue is the burden this proposal would have made on our oversubscribed primary school, our already overstretched GP practice (long waiting times for an appointment, up to 3 weeks and lack of any infrastructure to support major changes.

removal of site A47

50 residential housing units

I have lived in the Paddocks since newly built in 1976 and was delighted to hear that this inappropriate proposal was removed from the plan. The only access the to the new development would have been through the Paddocks which would have resulted in the possibility of a possible 100 additional vehicles entering/leaving the Paddocks several times a day. Our exit road is already down to one lane caused by cars parked all day by users of the railway station. To exit The Paddocks is already a blind spot, especially to the right and most of my comments in A46 also apply.

Strongly object:

To All proposals to allow housing to built outside of the Green belt on land in and around Normandy and surrounding villages. Green Belt is there to ensure urbanisation linking one town to another with GBC local plan seemingly favouring that the vast majority would be to the west of Guildford. All of these proposal have a deeply detrimental effect on local villages, transport, health services, schools and more. The current infrastructure is just not in place to support this level of housing density.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/363</th>
<th>Respondent:</th>
<th>17350465 / Christopher Holton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removal of site A46 and Site A47

I wish to register my support for the removal of these sites owing to the inability of the infrastructure to cope with developments of this magnitude, and the fact that this is Green Belt land.

Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers lane, Flexford, Walden Cottages, and Palm House Nurseries traveller site:

I object to this as placing these homes outside of the Green Belt could enable development within these areas at a much higher density and will give greater success for future planning applications.
I also wish to object to the proposal for 10,000 homes in the Normandy Area again due to the inability of the infrastructure to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/365  Respondent: 17350497 / Ellie Punshon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have looked carefully at the new draft Local Plan and I wish to OBJECT for the following reasons.

East Horsley is a small village which does not have the infrastructure of roads, rail, parking, medical facilities or schooling to support such a huge increase in population. Fifty seven percent of new housing proposed is on land that is currently categorised as Green Belt. This is flouting government law which established Green Belt to protect the countryside for future generations.

It is proposed that East Horsley is to be “inset” from the Green Belt. This proposed change in settlement boundaries means that the East Horsley settlement area will increase by 37%. At the moment, one hundred houses are proposed near East Horsley station and over two thousand on the former Wisley Airfield, only about one mile from the East Horsley parish boundary. The site at Wisley has recently been increased to now include two more farms!

While the ONS forecasts population for growth for Guildford at 10.4% over the Local plan period, GBC proposes to increase the housing stock by 22%. Since Brexit, forecasts of increasing population numbers have been reduced, yet GBC are continuing to predict massive increases in population, which quite frankly, does not make sense.

Again, I wish to register my strong opposition to the changes proposed by GBC is their latest draft of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2740  Respondent: 17353249 / Walnut Property Investments Limited  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Support is generally given to Policy A9 which allocates the site at 77-83 Walnut Tree Close, for offices (B1a) subject to the objections previously made to the policy namely, the limitation placed on the floorspace allocation for approximately 3,000 sq.m where:

- The site currently consists of 37,300sq.ft / 3,470sq.m;
- A further allowance should be made to include a further 400 sq.m in recognition of the potential for redevelopment within the gap between either 77-85 or 97-105 Walnut Tree Close;
- Recognition that it is the design process rather than any arbitrary limitation on the allocation floorspace should be the driver in the redevelopment of this sustainable town centre site. In order to allow sufficient flexibility within the design process the policy should be redrafted to refer to at least the quantum of development currently existing on site plus an additional 400 sq.m for development either in the gap between 77-85 or 97-105; and
- Flexibility in the use should reflect the ELNA findings for the need for ‘B1a and B1b’, Office and Research and Development uses. In addition to the above, it should be noted that:
  - A further building now demolished, was present on site, and which is still referenced on the allocation plan. If this is also taken into account the previous developed quantum would be higher again;

The current buildings are of very poor quality both in terms of the accommodation provided and their impact on the surrounding environmental and amenity value.

For ease of reference, these representations are attached as Appendix A.

Notwithstanding the above, objection is raised to the detail of the policy including:

- Limitation of the site’s redevelopment solely for B1 employment use.

As outlined in the objection to the Spatial Vision and Policy S2: Borough-wide Strategy set out above, there is clearly a need for the identification of further sites for sustainably located, residential development. The character of Walnut Tree Close is changing to become much more residentially orientated. Accordingly, and being previously developed, very sustainably located on the edge of the town centre, with excellent and acknowledged pedestrian, cycle and bus links, the site at A9 is ideally suited to a mixed use development including up to 70 no 1 and 2 bedroom apartment units. The policy at A9 should therefore be modified to reflect this mixed use potential as follows:

**Allocation: The site is allocated for approximately** at least 3,870 sq. m of mixed use development including residential (C3) and offices (B1a).

Two changes proposed to the text beneath this policy are proposed in terms of:
- An additional requirement - c) Consideration of views in and out of the adjacent River Wey Conservation Area; and to the
- Opportunities:
  (2) Potential facilitation of / contribution to Sustainable Movement Corridor having regard to the Sustainable Movement Corridor Supplementary Planning Document Support; and
  (5) Improve views from Walnut Tree Close to the River Wey and provide pedestrian access through the site to the towpath.

In terms of the additional requirement c) made, the site is currently in B1a and B1c use and is therefore defined as previously developed. The Policy acknowledges that the site is located within the defined Town Centre and as such is a very sustainably located for new development. Opportunities within the proposed development allocation exist to reduce flood risk in the local area, improve the links to the river and to and from the town centre and improve green infrastructure provision. Above all, the site has significant potential in terms of the character of the surrounding area both in terms of the amenity of adjoining residential occupiers and the character of built fabric and its impact on the setting of the adjoining Conservation Area. However, the site is already very constrained in terms of a restricted curtilage and adjacent residential and commercial development which surround the site on 3 sides and the River Wey on its fourth side. It is recognised that the site has the potential to improve the setting of the Conservation Area through its redevelopment but there are currently no views through the site to or from the River, nor any public right of way through the site. To require such elements further limit the site’s potential redevelopment. Consequently, it is important not to further constrain the site by unduly reducing its redevelopment potential and therefore its viability and scope to facilitate the benefits set out above. The additional requirement for ‘Consideration of views in and out of the adjacent River Wey Conservation Area’ is currently not clear in what it is seeking and because it is important to have clarity and not to further limit the site’s potential for redevelopment, requirement c) should therefore be amended as...
Requirement c) Consideration of views towards the site from in and out of the adjacent River Wey Conservation Area.

In relation to the proposed amendments to the site’s opportunities:

(2) Potential facilitation of / contribution to Sustainable Movement Corridor having regard to the Sustainable Movement Corridor Supplementary Planning Document Support;

This opportunity would appear to relate to the safeguarding of land for the replacement of Yorkie’s Bridge as part of the Sustainable Movement Corridor Town Centre Phase 2 set out in Policy A10. The site is recognised as being in a very sustainable location which facilitates movement by pedestrians and cyclists. Proposals for a replacement bridge would therefore support the site’s existing sustainable credentials. The same statement goes for all other development and redevelopment in the vicinity and there is therefore concern that by highlighting a potential link between policies A9 and A10 as a specific opportunity, a disproportionate burden will be placed on the site’s redevelopment whereas other development allocations should also be factored in. It is therefore suggested that the following changes should be made to opportunity (2):

Opportunity (2) Potential facilitation of / contribution to Sustainable Movement Corridor with further enhancements set out in having regard to the Sustainable Movement Corridor Supplementary Planning Document Support. Accordingly, there is scope to relax the standard of on site car parking requirements which will in turn encourage and facilitate further car free modes of transport.

and

(5) Improve views from Walnut Tree Close to the River Wey and provide pedestrian access through the site to the towpath.

As with the concerns raised against the additional proposed requirements above, there is a need to avoid unduly constraining the site’s redevelopment potential and its ability to secure enhancements for the surrounding properties, occupiers, setting of the Conservation Area and built fabric of the vicinity generally. There are currently no views through the site to or from the River, nor any public right of way through the site. The site is already very constrained. As such it is not feasible to highlight the creation of such elements as a viable opportunity and this should therefore be amended to reflect reasonable opportunities as follows:

Opportunity (5) Enhance views from Walnut Tree Close to the setting of and views from the River Wey Conservation Area and provide pedestrian access through the site along the towpath facilitated by the site’s redevelopment.

Two further opportunities resulting from the site’s redevelopment should be included within the list of Opportunities such that it presents the potential for the provision of high quality, Grade A office accommodation and / or provision of a significant number of small residential units (up to 70no. 1 and 2 bedroom apartments) which would assist with the overall provision of more affordable accommodation for young people as well as the corresponding provision of affordable housing specifically, a longstanding issue acknowledged across both the Borough and HMA; and the enhancement of the urban fabric. Two further opportunities should be added as follows:

Opportunity (7) The provision of high quality, Grade A office accommodation facilitated by the site’s redevelopment.

Opportunity (8) The provision of small residential units which are more affordable for students and young people and the corresponding increase in affordable housing units specifically.

Finally, whilst support is given for the site outline identified in the plan attached to Policy A9 to include the gap between numbers 99 to 103 Walnut Tree Close for clarity this should be reflected in the policy heading:

Heading to Policy A9 and Policy Plan A9: Heading to be amended to read:

‘Land to the rear of 77 to 83 and between 99 to 103 Walnut Tree Close’

These objections are made on the basis of soundness as the policy will not be effective unless modifications are made as set out above.

Policy D4: Character and design of new development
The aspiration for high quality design as set out in the criteria at Policy D4 is generally supported. In particular criteria e) which seeks to ensure appropriate density to make the most efficient use of the land whilst responding to local character and context.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

A change to Policy A9 is requested to read:
“Policy A9 77 to 83 and 99 to 103 Walnut Tree Close, Guildford
The site is allocated for at least 3,870 sq.m of offices / research and development(B1a and b).
... - Contemporary A design approach, whilst respecting respects the proximity to the River Wey
...“
This is to reflect the existing development on site and the need to maximise efficient use of this very sustainable site and which respects the site’s context without being prescriptive in terms of the design approach.

Attached documents: [Reps_Guildford_Submission_Local_Plan_Focused_Consultation_Walnut_Tree_Close_July_2017-1_Redacted.pdf](Reps_Guildford_Submission_Local_Plan_Focused_Consultation_Walnut_Tree_Close_July_2017-1_Redacted.pdf) (746 KB)

---

Comment ID: pslp171/2407  Respondent: 17353249 / Walnut Property Investments Limited  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4: Character and design of new development

The aspiration for high quality design as set out in the criteria at Policy D4 is generally supported. In particular criteria e) which seeks to ensure appropriate density to make the most efficient use of the land whilst responding to local character and context.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1221  Respondent: 17353249 / Walnut Property Investments Limited  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Reference should also be made to the HBF representation which, as members, we fully support.

**Objective Assessed Housing Need**

The West Surrey SHMA 2015 concluded that there was an objectively assessed need for 13,860 dwellings (693dpa) in Guildford Borough. This conclusion was based on drawing together the following threads:
- The SHMA calculated an expected employment growth of 13,860 in the borough over the Plan period 2013-2033 giving rise to 693dpa;

This figure was then adjusted to include:
- Affordability pressures - Both across the HMA and in Guildford Borough itself, affordability has long been recognised as a critical issue. The level of households per year that are expected to require support to meet their housing needs and thus be eligible for affordable housing is significant at 455 households per year. A significant proportion of these are younger households. The SHMA responded to this level of need by seeking to improve affordability through adjusting the household formation rates to the 2001 level arising in a need of 668 dpa;
- Student growth - A higher than anticipated level of growth in the student population than previously assumed in the demographic analysis and taking into account planning assumptions that a greater proportion of students would live in households rather than university managed accommodation;

The Guildford Addendum Report, 2017 has been published to the West Surrey SHMA 2015 and has been used to inform the number of houses planned for over the lifetime of the Local Plan 2013 - 2033. The 2017 Addendum concludes that there is a need for 12,426 homes between 2015-2034 (654dpa), some 50 dpa less than the 2015 SHMA Report.

There would appear to be an over-reliance on economic factors affecting the housing requirement in a climate with much uncertainty with Brexit negotiations currently at an embryonic stage. The extent of the impact depends on international negotiations that are yet to take place and the government’s future policy response. This means that any estimates made will be subject to a high degree of uncertainty. The NAO Analysis Report July 2017 confirms that ‘Uncertainty will continue to remain for some time around the forms that trading relationships will eventually take after the UK leaves the EU’.

In the current climate where there is considerable uncertainty over the Brexit negotiations it is far too early to make assumptions about the implications they may have for the economy and particularly housing requirements. Accordingly, such elements as international migration should be set aside until such time as a greater degree of certainty as to the outcome is known.

It is therefore considered that the 2017 Guildford Addendum Report is premature in concluding a reduction in the objectively assessed housing needs of the borough and that these should revert to the 2015 West Surrey SHMA figures.

**Duty to Cooperate**

It is also of some concern that the 2017 Addendum covers only Guildford Borough and therefore looks at the Borough in isolation from the rest of the Strategic Housing Market Area (Waverley and Woking). This has been highlighted through discussions at the Waverley Examination at the end of June 2017. The generally agreed view there was that Waverley were being overly prescriptive in their application of landscape designations and that further housing provision could be accepted as a result. Conversely, Woking, which adopted its Core Strategy in 2012 for the period up to 2027, plans for a housing provision of just 292dpa as opposed to its objectively assessed need of 517dpa. Consequently there is a significant unmet need in Woking Borough which should be addressed across the HMA as a whole. Neither Waverley, nor Guildford appear to be taking the Duty to Cooperate very seriously in this respect, demonstrated by the 2017 SHMA Addendum considering the needs of Guildford Borough in isolation from the rest of the SHMA. As a result of the debate at the Waverley Examination, it is therefore highly likely that the Inspector will recommend that Waverley takes a significant proportion of the unmet need from Woking, leaving the remainder to be identified within Guildford Borough.

**Five year Supply of Housing Land**
The 2017 Addendum to the LAA sets out the five year housing requirements 2019 - 2024 and the identified supply. Applying the 20% buffer as a consequence of persistent under-delivery, there is a shortfall over the five year period of some 881 units. Planning for a shortfall in the five year housing land supply at the outset of the Plan period, cannot be considered to be effective and the Plan should be declared unsound.

**Soundness**

As a consequence, of the discussions above, objection is made to the Plan’s 'Spatial Vision’ and Policy S2: Borough-wide Strategy, which reduces the delivery of homes from 13,860 to 12,426 in the period up to 2034. The Plan is not considered to be either positively prepared or justified. Neither is it considered to be effective in terms of delivering sufficient new homes to meet the objectively assessed housing needs of the Borough. Accordingly the Plan is currently considered to be unsound and the following amendments are sought:

i) The delivery of housing should be reinstated to the level set out in the 2016 draft Plan;
ii) Greater flexibility should be given to the redevelopment potential of existing, sustainable, previously developed sites which could bring forward additional housing, making the most effective use of available sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Comment ID:** pslp171/1259  **Respondent:** 17355265 / James and Sarah Gooden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

---

We are writing to object to Guildford Borough Council's proposed changes in Policy P2 Green Belt because they have not addressed many of the 32,000 comments made to the 2016 plan. We are extremely disappointed that the Council has failed to recognise Normandy's and Flexford's contribution to the "Openness" of the Green Belt and are proposing "Insetting" the two Settlements rather than leaving them "washed over" by Green Belt. "Insetting" will create small islands of "Urban" land in the Green Belt, which is irrational.

Therefore we object to the proposed change that Normandy Settlement, Flexford Settlement and Walden Cottages should be Inset from the Green Belt due to the fact that:

- There is evidence in past planning appeals APP/Y36 151W/I 5/3002308, APPfY36I5/A110/2140630 and APPfY3615I/AJI0/2131590 that the land here contributes to the "Openness" of the Green Belt.
- There is evidence in the Sustainabilitv Appraisal Para 10.4.7 that the Agricultural Land between the settlements is of BMV quality, exhibits "Openness" and contributes to the rural economy.
- The land in and around the Settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog's Back).

Furthermore, Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to:

- Check the unrestricted sprawl of built-up areas.
- Prevent neighbouring towns from merging into one another.
- Safeguard the Countryside from encroachment.
- Preserve the setting and special character of historic towns.
- Assist with urban regeneration by encouraging the recycling of derelict and other urban land.
We additionally observe that Policy P2 unacceptably omits any assessment of the Green Belt's value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. We object to the statement in the Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are "now Inset from the Green Belt". This statement is untrue as GBC is proposing to "Inset" these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

In conclusion, the Council has provided no evidence of "Exceptional Circumstances" in the proposed submission documents, (as required by NPPF Para 89). This would be necessary if the Council were to remove any land from the Green Belt and to effectively redraw the Green Belt boundary. They cannot therefore legally proceed with Policy P2 as currently drafted. We trust that our comments will be considered carefully by GBC before the Local Plan is finalised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to removal of brownfield sites A4 and A34. The council has not adopted a ‘brownfield first’ approach.

I therefore strongly object to all proposed development A34, A43, A58, A42 on the grounds that the area will be grossly overcrowded causing urban sprawl. The roads are already at maximum capacity. One small breakdown occurrence in area causes vast traffic jams. I also object to the fact that the Guildford Borough Council ignored the thousands of objections from the Send/Ripley area and instead increased the allocation of housing etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp172/2778  **Respondent:** 17357249 / E Turner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

---

I object to lacking proper infrastruction planning for site A43 and A42. Forward to plan stated by Paul Spooner recognises ‘the signification infrastructure upgrades are required to support existing communities and planned overgrowth of the borough?. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure which is a key theme of our local plan. Development of sites A43 Garlicks Arch and A42 Clockbarn Nursery, Send would therefore be contrary to stated aims and items of the Plan and should not go ahead.

I therefore strongly object to all proposed development A34, A43, A58, A42 on the grounds that the area will be grossly overcrowded causing urban sprawl. The roads are already at maximum capacity. One small breakdown occurrence in area causes vast traffic jams. I also object to the fact that the Guildford Borough Council ignored the thousands of objections from the Send/Ripley area and instead increased the allocation of housing etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp172/2773  **Respondent:** 17357249 / E Turner  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I strongly object to Garlick’s Arch (A43) being extended. This will cause excessive urban sprawl. This site should not be removed from green belt – there are no excessive reasons for this.

I strongly object to the allocation of 6 Travelling Showpeople sites A34 Garlicks Arch. This site is for 400 homes and is therefore not compliant with the minimum of 500 stated in section 4.2.24 of the plan. A50 covers total need of 8 so there is no need for these on site A43.

I object to lacking proper infrastructure planning for site A43 and A42. Foreward to plan stated by Paul Spooner recognises ‘the signification infrastructure upgrades are required to support existing communities and planned overgrowth of the borough?’. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure which is a key theme of our local plan. Development of sites A43 Garlicks Arch and A42 Clockbarn Nursery, Send would therefore be contrary to stated aims and items of the Plan and should not go ahead.

I therefore strongly object to all proposed development A34, A43, A58, A42 on the grounds that the area will be grossly overcrowded causing urban sprawl. The roads are already at maximum capacity. One small breakdown occurrence in area causes vast traffic jams. I also object to the fact that the Guildford Borough Council ignored the thousands of objections from the Send/Ripley area and instead increased the allocation of housing etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2774  Respondent: 17357249 / E Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the very unfair balance of the Plan across the borough with the removal of site A46 from the plan (with proposed 1100 homes) and the reduction of housing planned in this version of the plan in other parts of the borough this PLAN has become even more biased against the North East of the borough. OF 11,350 homes proposed 4613 (40.6%) are within 3 miles of Send Marsh and Burnt Common and most area green belt This area will be even more overcrowded, grossly unfair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2775  Respondent: 17357249 / E Turner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object strongly. This clearly ignores the separation issue sited in previous plan between Gosden hill development and Send Marsh/Burnt Common. The area cannot take the extra traffic flow that will happen on already over congested roads.

I object strongly to proposal for Waste Management facilities in Green belt A58 Burnt Common. This [illegible word] not allowed for full and proper consultation

I therefore strongly object to all proposed development A34, A43, A58, A42 on the grounds that the area will be grossly overcrowded causing urban sprawl. The roads are already at maximum capacity. One small breakdown occurrence in area causes vast traffic jams. I also object to the fact that the Guildford Borough Council ignored the thousands of objections from the Send/Ripley area and instead increased the allocation of housing etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Guildford Town Centre Site Allocation A15 Land at Guildford Cathedral, Alresford Road.

We are concerned with new wording of requirements: point 4 on page 176; 'A holistic approach to the landscaping of the site to include no unacceptable impact on existing trees and mature hedges of significance'.

The word 'unacceptable ' is a vague term subject to interpretation, whereas the original wording: 'protect existing trees and mature hedges of significance is more precise.

Please also clarify the use of the words of 'significance' does this encompass not only the TPO's but also the Tithe hedge bounding the site? This hedge, and one other, both have continuous lengths of more than 20metres and have been in existence for 30 years or more,and so satisfies at least one of the criteria listed in part II of schedule 1 of the Hedgerow Regulations 1997.

The new vague wording should not replace the clearer existing ones, which instead should be strengthened and clarified.

Crucially, we believe the site should REMAIN designated as a protected open space with a small number of Cathedral houses. It is inappropriate to designate this particular site as C3 Housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

ALLOCATION A6

North St Retail Development. We have already stressed that retail development has a low GVA. A principal concern on this geographically-constrained site is difficult traffic access.

The amount of retail development proposed, some 39,000 sm, is close onto 40 % of current retail and far too great for an already constrained town centre. More specifically the retail forecast used is based on a Consultant’s report by Carter Jonas which has four basic flaws.

1. the retail data used is national data which ignores Guildford’s access problems.
2. internet shopping has had a huge growth in Guildford and many shops have closed.
3. the plan itself does not appear to take into account the existence of an already well established retail centre (The Guildford Society recognises this and urges the Council to assess the impact, which it does not appear explicitly to have done).
4. finally and most important this is a retail forecast for private development to the exclusion of other uses and assuming land is plentiful for all competing uses rather than constrained as it is in Guildford town centre.

Guildford, in our judgement, needs a much better balanced solution with housing and town centre employment playing a much larger part.

[these paragraphs should sit at the end of our A6 comments]

I hope this is self-explanatory

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1288  Respondent: 17365185 / Leslie Swark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to file my utter objection to the proposed possibility of the erection of homes in the Paddocks area.

This is green belt land and therefore should be sacrasanct to any building thereon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2797  Respondent: 17365377 / M Swark  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly support the removal of site A46 1,100 houses etc and site 47 no matter how [illegible word] there is too much traffic up and down Glaziers lane now these roads were not made for such amounts of traffic, also it will have a profound effect on road, sewage, wastewater, electricity supply and Doctors surgeries and I understand this is green belt not for building

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2798  Respondent: 17365377 / M Swark  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly support the removal of site A46 1,100 houses etc and site 47 no matter how [illegible word] there is too much traffic up and down Glaziers lane now these roads were not made for such amounts of traffic, also it will have a profound effect on road, sewage, wastewater, electricity supply and Doctors surgeries and I understand this is green belt not for building

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2777  Respondent: 17365633 / Diane Newton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
All of the above would create major traffic problems (we have problems now) The proposed slip road from and to the A3 onto the Clandon Road is just madness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2823  Respondent: 17366113 / E A and Brian Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are extremely relieved to see the removal of A46 and A47 from the local plan. The local infrastructure just could not cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2824  Respondent: 17366113 / E A and Brian Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are extremely relieved to see the removal of A46 and A47 from the local plan. The local infrastructure just could not cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1291  Respondent: 17366113 / E A and Brian Oliver  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp173/377</th>
<th>Respondent:</th>
<th>17366145 / Tara Cooling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>However our roads, sewage, power and water supplies struggle as it it, especially roads. With regular tail-backs on the A323 towards Ash and Puttenham Heath Road from the south in the afternoon and from the north in the morning. More building in areas around our village at Ash, Tongham and Blackwell Farm would exacerbate this and add to the misery of long delays, especially on the A31.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>10,000 homes close by a village with narrow roads will be a nightmare as it is a rat run already.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/2825</th>
<th>Respondent:</th>
<th>17366145 / Tara Cooling</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>I object to the proposal to inset Send Business Park from the Green Belt. It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the Policy A42 change at Clockbarn in Tannery Lane. To increase the number of houses from 45 to 60 is too much and will worsen traffic problems in Tannery Lane and at the A247 junction, not to mention pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2826  Respondent: 17366145 / Tara Cooling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch. There have already been thousands of previous objections made by us local people opposed to this plan. To date there has been no proven demand for Travelling Showpeople plots in this location so why should we cater for this? This is a stunning Green Belt area that we should protect and not build upon. This area is subject to frequent flooding and should not be built upon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2827  Respondent: 17366145 / Tara Cooling  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common. Notably it was deleted from the 2014 draft because of all the objections made previously. There is no need to build an industrial/warehouse development in the middle of the Green Belt when other places such as Slyfield and Guildford still have empty sites and industrial units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2830  Respondent: 17366465 / J F Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Page 2593 of 2988
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the POLICY A42 changes in respect of Clockharn Nursery, Tannery Lane, Send, where it is now proposed to build 60 homes in place of 45 ... an increase of 33%, thus invading more Green Belt land. This will mean much more traffic along the already very narrow Tannery Lane and also make huge problems, traffic-wise, at its junction with the A247, Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2831  Respondent: 17366465 / J F Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the POLICY A42 changes in respect of Clockharn Nursery, Tannery Lane, Send, where it is now proposed to build 60 homes in place of 45 ... an increase of 33%, thus invading more Green Belt land. This will mean much more traffic along the already very narrow Tannery Lane and also make huge problems, traffic-wise, at its junction with the A247, Send Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2832  Respondent: 17366465 / J F Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to POLICY A581 the land at London Road, Burntcommon, where it is now proposed to use the whole triangle of Green Belt land between the A3, Clandon Road, A247, and the old dead leg of the former dual carriageway that used to be the A3 before the Ripley By-Pass was opened 41 years ago. This new proposal will now take up 10 hectares, rather than the relatively small area previously allocated, and will vastly increase traffic flows and problems in the Burntcommon area, which are already very bad, especially at peak hours. The additional industrial traffic generated by these proposals will make the problems even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/2833  Respondent: 17366721 / Marilyn Backhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction
• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp171/1297  Respondent: 17366721 / Marilyn Backhurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy P3 - Countryside

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

• 4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

• 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

• Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: pslp172/2834  Respondent: 17366881 / Amanda Stevens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane. The sixty homes you are planning to build on that site are far too many. Sixty houses built there which will home sixty families will hugely exacerbate the problems that already exist in Tannery Lane and at the A247 junction. In addition to increased traffic problems, sixty homes built there will mean extra surface water which will lead to increased flooding in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2836  Respondent: 17366881 / Amanda Stevens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common. It was deleted from the 2014 draft because of all the objections made previously but yet it seems to have been reinstated. I cannot believe that there is a need to build an industrial or warehouse development in the middle of greenbelt when Slyfield and Guildford have empty sites and industrial units. Again, the repercussions of all that extra traffic will cause complete gridlock in the mornings. These roads are usually heavily congested as it is, apart from a couple of months in the summer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Firstly, I am very relieved to see the removal of sites A46 and A47 (however very disappointed that a private application has been submitted for this site and I will send a separate objection letter shortly about this).

I object to the Insetting proposed in Normandy and Flexford. What are the exceptional circumstances needed for removing this from the green belt? The openness of this area is very important to see and for our wildlife who need corridors of land to move freely in and not squeezed into small areas where they can’t flourish.

With regard to the Palm House Nurseries (A49) travellers site and Showmen of Whittles Drive (A50) I feel this should remain in the greenbelt and not ‘inset’ and they should not be given permanent status. In respect of Palm House nurseries the travellers set up illegally on that land and in my view should never have been given temporary status as it is going to be difficult to ever move them on.

My biggest worry is the 10,000 or so houses being built within a 10 mile radius of Normandy. Where is the new road infrastructure? I think this area will become gridlocked as it does every time there is an accident on the A3 or A31 in the Guildford area.

Blackwell Farm is a beautiful open site of Agricultural land as you leave Guildford to climb the Hogs Back it is an AONB. The thought of seeing this full of housing horrifies me. It will be the start of Guildford merging with Aldershot. This is prime agricultural land and should remain so in the green belt. It is the fault of the University that own this land that there is such a shortage of family homes in Guildford. Many have been bought up and made into bedsits for thousands of students which I have heard are 80% foreign. If the university had not become so large there would be more housing left in Guildford.

I attended a meeting in Normandy a couple of years ago were Matt Furness said GBC are proposing a tunnel like that at Hindhead for Guildford to help with the dreadful traffic problems on the A3. I don’t think you can begin to think about building on Blackwell Farm until such a tunnel is in place. What with The Royal Surrey Hospital with an A+E department so close to this site plus the Surrey Business Park. Traffic has improved since the new traffic light system has been in operation but if building goes ahead it will be chaos in that area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to policy A42 - to the original 45 homes and the increase to 60 homes, on the basis that it is in the Green-belt and is flood-plain: and that local roads including Tannery Lane and the A247 are too narrow and the latter already severely congested. As residents of over 50 years, we know this area is prone to flooding, but also that is an area of open space close to the Wey Navigation much used by walkers both local and those visiting the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2858  Respondent: 17368705 / Reginald and Mavis Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy A58 - on the grounds that it is Green-belt land so development is not permitted. There is vacant industrial property in the region, so there is no need for further industrial space now or in the foreseeable future. We object to the change of wording to 'minimum to replace maximum' of 7000 sq m, as this is a deliberate act to open up our area to unlimited development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1308  Respondent: 17368705 / Reginald and Mavis Perryman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We therefore object to the local plan as it stands, on grounds that development encroaches into the Green-belt: that the Borough has failed to provide satisfactory evidence of need or exceptional circumstances for most of the development, and that the Plan fails to provide infrastructure improvement already needed without additional local development. We forcefully object to removal or 'inset' from the Green-belt of Send and other villages in the Borough, or any sections of land such as Send Business Park (Policy 2 at paragraph 4.3.15). This can only be done in exceptional circumstances, for which none exist. This practice is a deliberate act to erode the Green-belt by stealth and must not be allowed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Local Plan needs also to take into account the impact of leaving the EU, which at this stage is difficult to assess, although it may result in a reduction in the local population if some EU citizens return home. It should therefore be put on hold until this process is fully resolved in 2019.

In the meantime, development should be contained to already available town and brown-field sites, where it is lawful and appropriate. Councillors and other elected representatives at all levels need to look to the long term future, and take into account not just our area, but the overdeveloped south of England as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Land at Burnt Common Policy A58
I OBJECT to the new allocation of a minimum of 7000 sq in of Industrial or warehousing space on this site. (I note the change from the previous 'maximum' to 'minimum')
This is a massive over allocation of land in the Green Belt for B1c, B2 and B8 usage.
There are vacant sites and warehousing on existing industrial parks in Slyfield and Guildford.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/2903  Respondent: 17372769 / P Robertson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A46: Land to the south of Normandy and north of Flexford
Site A47: Land to the east of The Paddocks, Flexford
I support the removal of sites A46 and A47 with associated development from the proposed plan.
This is a common sense decision, these are villages and not urban areas. These are Green Belt sites.
The infrastructure is totally inadequate to support increased development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/2904  Respondent: 17372769 / P Robertson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
Site A46: Land to the south of Normandy and north of Flexford
Site A47: Land to the east of The Paddocks, Flexford
I support the removal of sites A46 and A47 with associated development from the proposed plan.
This is a common sense decision, these are villages and not urban areas. These are Green Belt sites.
The infrastructure is totally inadequate to support increased development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Infrastructure
The A323 at Normandy reaches traffic gridlock in the evenings towards Ash/Aldershot and heavy traffic towards Guildford in the mornings. This will be further exacerbated as the new developments in Ash continue. This brings pollution and stress to the villages which means Westwood Lane, Glaziers Lane and Wyke Avenue become 'rat runs.'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P2 Green Belt:
Removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site. I strongly disagree for these areas to be inset and lose the protection of the Green Belt status Green Belt is vital in the villages of Flexford, Normandy and Wyke to protect against urban sprawl and 'back yard development.' Planning Inspectors have stated on previous occasions that the villages of Normandy, Flexford and Wyke and their surrounding Green Belt are vital to prevent further encroachment of the countryside by urban sprawl, particularly from the north, east and west.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy H2: Affordable Homes
The Council will be aware that Planning Practice Guidance (Reference ID: 23b-031-20161116) states that:
"There are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development. This follows the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014 and should be taken into account".

These circumstances include that: "Contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm".

We acknowledge paragraph 4.2.40 of the proposed Local Plan that indicated a level of flexibility when it is demonstrated that the contribution would adversely impact the sites viability. To ensure that Policy H2 is deliverable, it is our view that this wording should be included within the text of the policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy P2: Green Belt
Policy P2, along with the policy map and site allocations, establishes the principle of the need to remove land from the Green Belt and identifies appropriate locations to do so. The NPPF states that:
"When drawing up or reviewing Green Belt boundaries LPAs should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary" (para. 84). The NPPF goes on to say that LPAs should: "satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period" and "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent" (para. 85).

The Council has acknowledged that development in and around Guildford's largest towns will not provide the land needed to meet its OAN. It has been demonstrated through the recent Inquiry on Howard of Effingham and Lodge Farm that the Green Belt in Effingham is out of date. The Green Belt has not been reviewed since 1987. The Green Belt Study commissioned from expert consultants for the purpose of informing the Local Plan identifies that Lodge Farm could be developed without significantly compromising the purposes of the Green Belt. We maintain our view that the Effingham Sites (Site Allocation 69) was an appropriate Green Belt release and continues to be supported by the Council's evidence.
base. We do not believe that the additional information produced by the Council since the Draft Local Plan (2014) justifies the removal of the Effingham Sites (Site Allocation 69). We regard the revised approach to allocations as inconsistent and not justified against reasonable alternatives.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1322  Respondent: 17372865 / Berkeley (David Gilchrist)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 sets out the council's approach to meeting its Objectively Assessed Needs (OAN) as required by the NPPF (paragraphs 14 and 47).

The Proposed Submission Local Plan has pushed the plan period back from 2013-2033 to 2015-2034. Given the Borough's significant under-delivery since 2011, despite an increased overall target, the current approach means Guildford is very likely to see fewer homes delivered by 2033 than is required or was previously planned for.

The phasing of development in the Proposed Submission Local Plan 'backloads' the housing target. The overall housing target is equivalent to 654 dwellings per year, but the Council is not planning to deliver that many homes in any year until 2026/27. It is already generating a significant backlog of housing need with only 388 homes delivered in the last full year for which data is available (2015/16).

The proposed approach does not plan to meet OAN in any reasonable timescale, will add to the Council's backlog, and in practice will delay required development. On that basis, we do not believe it is positively prepared or effective.

The Council will also be aware that from November 2017, authorities that deliver below 85% of the borough's OAN will be expected to plan for an addition 20% buffer on their 5 year plan.

Delivery of below 65% from November 2020 the presumption in favour of sustainable development in the National Planning Policy Framework would automatically apply (Housing White Paper 2017).

As the Council is aware, the Government sets a very high priority on the delivery of new homes and associated infrastructure, and the failure of the Council to produce an effective strategy to do this means the Proposed Submission Local Plan is not consistent with national policy.

Sufficient, deliverable sites need to be identified to meet this increasing need for housing land, particularly in the east of the Borough, where capacity has been released due to the grant of permission for SANG land at Long Reach.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
REPRESENTATIONS TO GUILDFORD BOROUGH COUNCIL'S PROPOSED SUBMISSION LOCAL PLAN JUNE 2017

Berkeley Homes has been working alongside Howard of Effingham School for a number of years to deliver much needed housing and a new school to the area. These sites were allocated for development in the Draft Local Plan 2014 but refused planning permission by Guildford Borough Council in March 2016. Consequently, an appeal was lodged against this decision and a public inquiry was held in May 2017. The suitability of the sites has been demonstrated through the inquiry and accordingly, we believe the sites should be included in the Guildford Local Plan as Site's Allocated for Development - for the provision of a replacement Howard of Effingham School and up to 295 residential dwellings.

Following the recent appeal decision on land at Long Reach for the provision of a Suitable Alternative Natural Greenspace (SANG), Guildford has the opportunity to release housing sites in that part of the District and allocating the Howard of Effingham / Lodge Farm site would assist in delivering homes in this part of the District, including the provision of much needed affordable housing.

You will be aware that the Local Plan will be tested by the Inspector against the four tests of soundness (National Planning Policy Framework (NPPF) para 182), namely that it is positively prepared, justified, effective and consistent with National Policy. We set out below why we are of the view that the Proposed Submission Local Plan does not meet these tests in relation to the Spatial Strategy (Policy S2), Affordable Homes (Policy H2), the Green Belt (Policy P2), and Infrastructure Delivery (Policy ID1).

Conclusion
As a whole, the Proposed Submission Local Plan June 2017 is greatly flawed. The currently proposed phasing of housing and spatial strategy will not deliver Guildford's Objectively Assessed Needs within a reasonable timeframe, if at all. The recently granted SANG at Long Reach also releases housing capacity in this part of the Borough and accordingly, the District wide allocations should be reviewed as a whole to ensure appropriate distribution. The previous Draft Local Plan (2014), substantially based on the same evidence, allocated Howard of Effingham School, Effingham Lodge Farm and Brown's Field (Site Allocation 69) to provide homes and a bigger school. This allocation has been removed but remains an appropriate, deliverable and sustainable means of meeting the Borough's need for new infrastructure and homes. We will continue to seek to work with Guildford Borough Council and Effingham Parish Council to bring forward the delivery of the Effingham sites and are happy to discuss the above points further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I especially object to the former sites A46 and A47 being taken out of the Green Belt despite the housing allocations from these sites being removed. This is incomprehensible when the high sensitivity of these sites is part of the reasons for removing the allocations!

I object that the Policies Map – an important document – is of a scale that makes the detail impossible to distinguish. One of the sites I am most concerned about – the former A47 land – is completely covered by its label. Large swathes of green belt cover would also appear to be missing from the map.

The NPPF states ‘the essential characteristics of Green Belts are their openness and their permanence’ (NPPF). Past verdicts of planning inspectors have declared that Normandy/Flexford green fields (A46) contribute to the ‘openness’ of the Green Belt and a panoramic view of green fields to the Surrey Hills AONB – and indeed recent assessments are that this area along the south of the Hog’s Back is of sufficient quality to itself be included with the AONB due to its contribution to views. It is hugely important that this be considered before removing its protection and permanently losing the character of the area that make it outstanding in a national context.

Paragraph 4.3.12 states that “only those villages whose open character makes an important contribution to the Green Belt should be included in the Green Belt”. I contend that the land in both A46 and A47 makes an unparalleled contribution to the Green Belt which stretches from Guildford in the east to Ash/Tongham in the west. If this area is inset and built upon in the manner proposed it will be the beginning of urban sprawl across this stretch of countryside which Green Belt policy was designed to prevent. The Government have indicated that Green Belt is supposed to be protected, but GBC are trying to justify development in this area where they themselves designated it as having a 'Red' status under their system for quantifying sensitivity (red being the most sensitive and least likely to be developed).

GBC have ignored the other existing value of A46 and A47 in removing the Green Belt protection. This land is high grade farmland and also includes several Sites of Nature Conservation Importance. All policies on biodiversity are been ignored when proposing to inset these areas. The proposals are contrary to the NPPF’s requirements on biodiversity and the natural environment. In section 11 headed “Conserving and enhancing the natural environment”, it is stated that planning policy should protect and enhance valued landscapes and minimise impacts on biodiversity, providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations…..”. GBC is failing to do this in several ways in relation to A46 and A47 with no clear justification or evidence given as to why this is the case. It seems that no consideration has been given to the value of the existing SNCIs, the wider network of hedges and trees and the fact that all this is within one of Surrey’s Biodiversity Opportunity Areas – despite Policy 14 seeking to promote exactly these qualities. I object that Guildford has not given biodiversity the full consideration legally required, in breach not only of these policies but their statutory duty under the NERC Act 2006.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object that the Policies Map – an important document – is of a scale that makes the detail impossible to distinguish. One of the sites I am most concerned about – the former A47 land – is completely covered by its label. Large swathes of green belt cover would also appear to be missing from the map.
- The NPPF states ‘the essential characteristics of Green Belts are their openness and their permanence’ (NPPF). Past verdicts of planning inspectors have declared that Normandy/Flexford green fields (A46) contribute to the ‘openness’ of the Green Belt and a panoramic view of green fields to the Surrey Hills AONB – and indeed recent assessments are that this area along the south of the Hog’s Back is of sufficient quality to itself be included with the AONB due to its contribution to views. It is hugely important that this be considered before removing its protection and permanently losing the character of the area that make it outstanding in a national context.
- Paragraph 4.3.12 states that “only those villages whose open character makes an important contribution to the Green Belt should be included in the Green Belt”. I contend that the land in both A46 and A47 makes an unparalleled contribution to the Green Belt which stretches from Guildford in the east to Ash/Tongham in the west. If this area is inset and built upon in the manner proposed it will be the beginning of urban sprawl across this stretch of countryside which Green Belt policy was designed to prevent. The Government have indicated that Green Belt is supposed to be protected, but GBC are trying to justify development in this area when they themselves designated it as having a 'Red' status under their system for quantifying sensitivity (red being the most sensitive and least likely to be developed).
- GBC have ignored the other existing value of A46 and A47 in removing the Green Belt protection. This land is high grade farmland and also includes several Sites of Nature Conservation Importance. All policies on biodiversity ave been ignored when proposing to inset these areas. The proposals are contrary to the NPPF’s requirements on biodiversity and the natural environment. In section 11 headed “Conserving and enhancing the natural environment”, it is stated that planning policy should protect and enhance valued landscapes and minimise impacts on biodiversity, providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations ……”. GBC is failing to do this in several ways in relation to A46 and A47 with no clear justification or evidence given as to why this is the case. It seems that no consideration has been given to the value of the existing SNCIs, the wider network of hedges and trees and the fact that all this is within one of Surrey’s Biodiversity Opportunity Areas – despite Policy 14 seeking to promote exactly these qualities. I object that Guildford has not given biodiversity the full consideration legally required, in breach not only of these policies but their statutory duty under the NERC Act 2006.
- I object to insetting and making permanent the traveller site at A49. A50 should not be inset. Normandy already has a disproportionate number of sites.

In summary, I object to the inset of Flexford settlement, Normandy settlement, Walden Cottages and the traveller sites A49 and A50, question whether there is any justification for the green belt boundaries around Normandy and Flexford to be changed from the existing and request that the insetting be removed from the new plan, particularly for former sites A46 and A47.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the changes to policy P2. They do not appear to have taken into account thousands of comments made during the 2016 consultation and are at odds with national and local policies and the evidence base for this plan process.
- I object to the changes made to the settlement boundaries in Normandy and Flexford, insetting these areas from the Green Belt. No argument of very special circumstances has been advanced for consideration – those mentioned in 4.3.18 would not justify any change in Normandy and Flexford. The impression given in paragraph 4.3.13 is that this has already happened rather than being a proposal; this is misleading and may cause people not to realise the proposed change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/252  Respondent: 17373025 / Stephen Marshall  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

This is a consultation response to the Proposed Submission Local Plan dated June 2017, mainly in relation to the Normandy and Flexford area where I am a resident. I am by profession an environmental consultant specialising in advising local authorities on matters of ecology, open space and planning. I am a former local government Assistant Director in these areas.

I support the removal of policies / sites A46 and A47 and am pleased that the Council has recognised the multi-faceted reasoning for this.

I however strongly object to several other aspects of the plan relating to Normandy, Flexford, the Hogs Back, general changes to the green belt boundary and how the plan interprets / fails to interpret parts of the evidence base. I believe these elements mean the plan remains unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1334  Respondent: 17373345 / Owen Neal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

ID4 POLICY ID4: Green and blue infrastructure

As previously stated, Sport England considers that the policy is not supported by a sufficiently robust and up to date assessment of needs for sport and recreation. This should be in the form of a Playing Pitch Strategy (PPS) and a built or sports facilities strategy for the borough in accordance with Sport England’s guidance. Sport England does not consider that the council’s open space, sport and recreation assessment based on the out-of-date PPG17 – planning for open space, sport and recreation is adequate and addresses the sport and recreational needs for the borough.

Furthermore, Sport England opposes the addition of the following paragraph:

4.6.49a National planning policy requires great weight to be given to the need to create, expand or alter schools to meet the needs of existing and proposed communities. This will be taken into consideration if development is proposed on open space and the development meets a legitimate educational need that is appropriately met on the site. National planning policy requires great weight to be given to the need to create, expand or alter schools to meet the needs of existing and proposed communities. This will be taken into consideration if development is proposed on open space and the development meets a legitimate educational need that is appropriately met on the site.

Sport England is concerned that this weakens protection of existing sports facilities and playing field land and is inconsistent with Sport England’s planning objectives and para 74 of the NPPF which seek to protect existing sports facilities and playing field land against loss from development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2929  Respondent: 17373505 / Paul Beach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2936  Respondent: 17373505 / Paul Beach  Agent:
I object to the Policy A42 change at Clockbarn Nursery in Tannery Lane for the following reasons:

1. There has been an increase in proposed building of houses from 45 to 60 – this is ridiculously too many for our area.
2. This totally ignores hundreds of previous objections by local residents.
3. Access to Tannery Lane at the A247 junction is not viable for the amount of traffic that will be incurred.
4. Tannery Lane itself if not capable of being used by large or numerous vehicles – it is a Lane.
5. This will be eroding even more of the Green Belt.
6. There is already bad surface water flooding in this area. This can only increase the problem.
7. This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

I object to the lack of proper infrastructure planning for sites (A43 and A42) The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan".

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlick’s Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2934  Respondent: 17373505 / Paul Beach  Agent: Paul Spooner
I object to the Policy A43, land at Garlick’s Arch, Send Marsh for the following reasons:

1. This totally ignores hundreds of previous objections by local residents.
2. There are no ‘exceptional circumstances’ as required by the National Planning Policy to take this area out of the Green Belt.
3. This will remove ancient woodland which cannot ever by regained.
4. Ripley and Send villages will merge, therefore defeating the purpose of the Green Belt.
5. The number of homes proposed is excessive. Send is a village. This is over-development to the extreme.
6. The area is subject to frequent flooding and is currently a Flood Zone 2 allocation.
7. The excessive traffic that will be generated will totally cause mayhem on the Send and Ripley roads. Already whenever there is a road closure nearby or traffic accident (almost a daily occurrence on the A3/M25) in the vicinity – the main Ripley, Send Marsh and Send roads are ridiculously congested or at a total standstill.
8. There is no proven demand for Travelling Show people sites in this location. This development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
9. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2932  Respondent: 17373505 / Paul Beach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2935  Respondent: 17373505 / Paul Beach  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A58, land at Burnt Common, London Road for the following reasons:

1. This was deleted from the 2014 draft plan because of all the objections previously made – therefore why has it been included again?
2. There has been a decline in demand for industrial land since the previous draft plant but the 2016 version uses the word ‘maximum’ a change from ‘minimum’ within it – this does not make sense.
3. There are already empty sites and units at Slyfield and Guildford and therefore no need to build new industrial and warehouse developments in our area. I can only envisage these will end up being empty too.
4. The 2017 Employment Land Need Assessment shows a reduction in demand for industrial land for the whole borough to 3.9 hectares. This policy is a huge allocation of 10 hectares for Send alone. Totally unacceptable.
5. The small roads around this area are already often at gridlock. This can only make the problem worse.
6. The merging of existing villages (which will occur) defeats the purpose of the Green Belt.

I object to the proposal for a Waste Management Facility in Green Belt (A58) The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned in policy 4.423a and does not allow for full and proper consultation. This is unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1337  **Respondent:** 17373505 / Paul Beach  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15)

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s removal from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2969  **Respondent:** 17374529 / Sarah Bowes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for the following reasons:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the overcrowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
1. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
2. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
3. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
4. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
5. Opportunity (3) should be common to all sites and is not unique to this site.
6. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
7. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
8. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
9. I object to the removal of additional 3.1 ha from the green belt without any justification.
10. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
11. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
12. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
14. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
15. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
16. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
17. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
18. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
20. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
21. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
22. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
23. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been
criticised by Mouchel for using out of date modelling software and is therefore unreliable.
24. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle
movements from this site with no justification.
25. I object to the housing number and particularly the fact that the Council have not, as required used any
constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.
26. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the
damage caused by nitrogen deposition and high pollution levels.
27. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of
12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of
a number of glaring examples of why the plan is not sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/396  Respondent: 17380161 / Nicola Banham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:
The impact on small surrounding roads will create traffic gridlock
It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the
beautiful Wey Navigation
There is highly restricted vehicular access along Tannery Lane in both directions
Further expansion or development at this location detracts from the openness of the Green Belt and is
inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3012  Respondent: 17380161 / Nicola Banham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is **33% more** and too much
- It ignores all the **hundreds of previous objections** made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation
- It will worsen traffic congestion in the local area which is already busy and often sees heavy traffic during and after peak hours, even when the major roads have cleared.
- There is no infrastructure, (schools, roads, shops, etc.), in place or proposed, to support the increased demand that will result from this development.
- It will increase the risk posed to cyclist using Tannery Lane and the surrounding roads. There is no proposal to improve cyclist's safety on these narrow country roads that will see an increase in motor vehicle traffic. This is of particular concern to me as I transport my children to and from nursery, by bicycle, along these roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley
- There is not currently sufficient infrastructure, roads and schools, to support the proposed increase in demand that will be placed upon the area with the proposed plans.
- The additional traffic will cause a significant increase in rush hour traffic trying to gain access to the A3, which already queues through the villages of Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3051  Respondent: 17380161 / Nicola Banham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick's Arch because:
It ignores all the thousands of previous objections made by local people
There is no proven demand for Travelling Showpeople plots in this location
It is beautiful permanent Green Belt and no "exceptional circumstances" exist
It will cause over-development of our village and the number of homes is excessive
It is exquisite ancient woodland that existed at the time of Elizabeth I
It will join up Ripley and Send and defeat the key purpose of Green Belt
It is subject to frequent flooding and is currently a flood zone 2 allocation
It is contaminated by lead shot accumulated over fifty years
It will generate excessive traffic that will block up the local roads of Send and Ripley
There is not currently sufficient infrastructure, roads and schools, to support the proposed increase in demand that will be placed upon the area with the proposed plans.
The additional traffic will cause a significant increase in rush hour traffic trying to gain access to the A3, which already queues through the villages of Ripley and Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously.
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
- The impact on small surrounding roads will create traffic gridlock.
- It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The impact on small surrounding roads will create traffic gridlock
It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1373  Respondent: 17380161 / Nicola Banham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:
• The impact on small surrounding roads will create traffic gridlock
• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
• There is highly restricted vehicular access along Tannery Lane in both directions
• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1215  Respondent: 17380865 / Crownhall Estates (Sir or madam)  Agent: Turley (David Murray Cox)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1: HOMES FOR ALL
Criterion 1 of the draft Policy requires new residential development to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest SHMA. Crownhall Estates consider that this aspect of the Policy should not be applied in a manner which requires the SHMA housing mix to be replicated on each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY P2: GREEN BELT

Crownhall Estates note that housing delivery within Guildford Borough is already highly restrained by the fact that a large part of the Borough is designated as being within the Green Belt. However it is noted (as demonstrated by paragraph 4.3.17 of the Proposed Submission Local Plan and the associated maps) that a large part of the Borough (currently designated as Countryside Beyond the Green Belt) is proposed to be designated as Green Belt.

These representations raise the following concerns regarding the Council’s intention to designate large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt:

• The process of assessing sites and the availability of land on the basis of the intention that it be designated as Green Belt;
• The implications of designating the additional land as being within the Green Belt on housing delivery during and beyond the Plan period;
• The implications of designating the additional land as Green to the delivery of sustainable development;
• Whether these areas (in particular the Land north of Poyle Road, Tongham) should be designated as Green Belt;

The process of assessing sites and the availability of land on the basis of the intention that it be designated as Green Belt.

The Council propose to amend Green Belt boundaries within the Borough through the emerging Local Plan. Within their proposals, they plan to designate the Land north of Poyle Road, Tongham (currently Countryside Beyond the Green Belt) as part of the Green Belt. In line with the NPPF, paragraph 83, the Council are required to demonstrate that exceptional circumstances exist in order to make said amendments to the Green Belt. These circumstances are given as a high level of need for housing and “the lack of sufficient suitable and deliverable sites located outside the Green Belt”. We find it incomprehensible that the Council considers the high level of housing need to represent an exceptional circumstance which justifies designating large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt.

As these representations explain, the conclusion that there is a ‘lack of sufficient suitable and deliverable sites located outside the Green Belt’ is a self-fulfilling prophecy arising from the decision not to assess sites further due to the intention that they be designated as Green Belt.

The Council’s approach is further undermined on the basis that sites within the Green Belt are proposed to be released, yet sites outside the Green Belt were discounted from further assessment on the basis of the Council’s intention to designate them as Green Belt.

The implications of designating the additional land as being within the Green Belt on housing delivery during and beyond the Plan period:

The Council’s proposal to designate large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt raises three particular concerns regarding housing delivery (notwithstanding the issue of whether or not they should be designated as such for Green Belt purposes):

• As it explains above the Council’s approach represents an artificially constrained view of land availability within Guildford Borough; the Council had not followed such an approach we consider that it would be reasonable to conclude that additional sites could be identified helping to meet the objectively assessed need for housing, particularly in the early part of the Plan period;
• Paragraph 83 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. Paragraph 83 of the NPPF continues by stating that “At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period on the basis that the Council has not been able to identify sufficient sites within existing urban areas or outside of the Green Belt to achieve...
homing required to 2034, it is highly unlikely that a forthcoming review of the Local Plan will be able to. In that circumstance, it is highly unlikely that a forthcoming review of the Green Belt boundaries will be required. On that basis, the proposed alterations to the Green Belt are highly unlikely to endure beyond the Plan period.

- There has been a track record of housing shortfall in the Borough, with the Council’s evidence showing 2.36 years supply of deliverable housing sites. As the NPPF sets out, very special circumstances must be demonstrated as part of a planning application if “inappropriate” development (as defined in the NPPF) in the Green Belt is to be allowed. The Secretary of State’s decision of 21 April 2017 in an appeal (PINS ref: APP/M1520/A/14/2216062) concerning land in Castle Point Borough highlights the issues of housing development proposed in the Green Belt. In that case, the Secretary of State concluded that the housing supply position was closer to the appellant’s proposition of 0.4 years. Designating large parts of the Borough (currently designated as Countryside Beyond the Green Belt) Green Belt would therefore provide no flexibility and very limited opportunities to help resolve a housing land supply shortfall at some point in the future. The implications of this are reinforced by paragraph 4.1.4 of the Proposed Submission Local Plan.

Within the Housing Topic Paper (June 2017), the Council states that:

- “To not amend boundaries (Green Belt), would lead to a significant undersupply of homes compared to the identified needs – approximately half”

Crownhall Estates consider that the proposal to designate additional land, namely that north of Poyle Road, Tongham as Green Belt, would compound the issue of land supply throughout and beyond the plan period.

Despite the Council’s claim that every effort has been made to investigate sustainable sites for housing delivery, they have clearly overlooked sites where development could be achieved, such as our Client’s site. This is clearly demonstrated by the decision not to assess the site given the proposal to designate the site as Green Belt which we consider to be fundamentally flawed. Within the LAA (2016), the Land north of Poyle Road, Tongham was not assessed as a possible allocation due to suitability issues related to the proposed Green Belt designation of this land and for no other reason. However, under the adopted Guildford Borough Local Plan (2003), the Land north of Poyle Road, Tongham is designated as Countryside Beyond the Green Belt (CBGB).

There is now clearly an identified need to bring such land forward for development to meet the housing needs of the Borough and provide an opportunity to meet unmet needs arising from within the wider Housing Market Area.

Whether these areas (in particular the land north of Poyle Road, Tongham) should be designated as Green Belt

Paragraphs 79 and 80 of the NPPF set out the five purposes of the Green Belt as well as the fundamental aim of ensuring their openness and permanence.

Paragraph 80 of the NPPF states that the Green Belt serves five purposes as shown below:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban areas.

The Proposed Submission Local Plan, and the proposed strategy for amending Green Belt boundaries, has been informed by various volumes of the Green Belt and Countryside Study conducted by Pegasus on behalf of the Council between 2013 and 2014.

A sensitivity map (dated March 2014, see below) produced as part of the Green Belt and Countryside Study was used as a starting point to inform proposed site allocations within the Proposed Submission Local Plan. The Land north of Poyle Road, Tongham falls within the Land north of Poyle Road, Tongham (circled in blue in Figure 1 below). This sensitivity assessment map shows that the K5 site is considered to be of ‘high sensitivity’ to Green Belt.

Figure 1: Sensitivity Assessment Map – Green Belt and Countryside Study)

There appear to be inconsistencies within the methodology of the Green Belt and Countryside Study. In Volume II of the Green Belt and Countryside Study (2013) the K5 site (that covers the Land north of Poyle Road, Tongham) is assessed against four Green Belt purposes, as guided by the NPPF and receives an overall score of 2 out 4. This overall score deems that K5 contributes less significantly to the purposes of the Green Belt than many of the other parcels assessed. Yet on the sensitivity map above (Figure 1 of these representations), the K5 parcel (circled in blue) is marked as ‘high sensitivity’ to Green Belt. The Housing Topic paper (2017) directly refers to this sensitivity map stating that land parcels marked as high sensitivity to the Green Belt scored either 3/4 or 4/4 within the Green Belt Study detailed above.
inconsistency within the methodology is particularly concerning as this study has formed part of the evidence base used within the updated Regulation 19 Local Plan (2017) and therefore the proposal to designate the area within the Green Belt.

Although the study finds the K5 parcel to have ‘less significance’ to the Green Belt, under the four stages of review the land is deemed suitable for Green Belt designation. However, the assessment also states that “the decision on whether to extend the Green Belt into land parcel K5 will also be informed by the likely levels of future development, and whether the land may be more appropriately designated as ‘safeguarded’, as defined within para 85 of NPPF”. If the Council is to designate land as Green Belt this must ensure the permanence of the boundaries, in line with paragraph 83 of the NPPF. If the Council deems the K5 parcel (including Land north of Poyle Road, Tongham) to be suitable for Green Belt designation would, under this emerging Local Plan, require that exceptional circumstances be demonstrated . It is evident that the Council is unable to ‘satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period’, in line with paragraph 83 of the NPPF.

The land parcel K5 assessed within the study covers the entire distance of the gap between the Tongham settlement area and Ash Green. The K5 parcel was deemed to serve two of four Green Belt purposes. Our client’s site forms only part of the K5 area (highlighted in yellow, within the K5 parcel outlined in red in Figure 2).

Figure 2: Land Parcel K5, Green Belt and Countryside Study
The Land north of Poyle Road, Tongham should be reviewed, as a singular parcel of land, for its contribution to the two Green Belt purposes the council have identified K5 to serve. The following table sets out the assessment of the area as contained in the Green Belt and Countryside Study alongside our comments as to how the site functions in isolation.

In summary of the assessment above, when reviewed independently the Land north of Poyle Road, Tongham does not achieve any of the purposes of the Green Belt.

We also note that the area of Suitable Alternative Natural Greenspace (SANG) approved under application reference 12/P/01973 lies immediately to the land north of Poyle Road, Tongham. This SANG will ensure the maintenance of an area between Ash/Tongham and Ash Green which therefore checks the unrestricted sprawl of settlements.

Paragraph 85 of the NPPF requires that when defining Green Belt boundaries, local planning authorities should (inter alia):

• Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
• Not include land which it is unnecessary to keep permanently open; and
• Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;

As these representations establish, designating the land north of Poyle Road, Tongham would not fulfil the requirements in the three points above. Tongham occupies an elevated position in the settlement hierarchy and the designation of Green Belt as proposed would severely restrict opportunities for sustainable patterns of development. It is unnecessary for the land north of Poyle Road, Tongham to be kept permanently open. Even if it were developed, there would remain an area of separation between Tongham and Ash Green (partly due to the SANG to the north and partly due to a remaining area of countryside). Furthermore, as these representations explain, if this area is to be defined as Green Belt, the Council cannot be satisfied that it will not need to alter the Green Belt boundaries at the end of the Plan period (or as part of a review of the Local Plan).

We note that in the Waverley Local Plan Part 1 Examination, the Inspector was asked to consider the identification of new areas of Green Belt at Cranleigh and Farnham in order to ‘protect’ these settlements. We understand that the Inspector rejected that approach.

In addition to concerns regarding the Green Belt Assessment methodology and the judgements taken forward to the Proposed Submission Local Plan, it would appear that the Council have solely considered whether the assessed parcels of land fulfil the Green Belt purposes rather than consider the need to deliver sustainable patterns of development, as required by paragraph 84 of the NPPF.

The Guildford Borough Settlement Hierarchy (May 2014) forms part of the evidence base that has informed the Guildford Borough Proposed Submission Local Plan (Regulation 19), with the purpose of promoting sustainable development.

Although Guildford Town Centre, Guildford Urban Area and the Ash and Tongham Urban Area are ranked as the three most sustainable settlements and the main areas for development, this does not appear to be reflected in the distribution of development, namely to Tongham.
Guildford Borough Council must ensure that it has sufficiently assessed sites for housing delivery on the edge of such settlements, particularly in locations which are in the Countryside Beyond the Green Belt and which provide the opportunity to deliver sustainable patterns of development.

We consider that the Land north of Poyle Road, Tongham provides such an opportunity.

The settlement hierarchy and the Sustainability appraisal identify the sustainable location of the Ash and Tongham Urban Area. The development of the Land north of Poyle Road, Tongham would form an extension to the Tongham Urban Area, a sustainable location and subject to the determination of alive planning application (GBC ref: 17/P/01315) could be considered suitable for ‘development now’.

In light of the five year housing land supply of 2.36 years, the sustainable nature of Tongham and the Land north of Poyle Road, Tongham and its poor performance against the Green Belt purposes it would seem unlikely that exceptional circumstances exist to designate the site as Green Belt.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Guildford_Borough_Proposed_Submission_Local_Plan__Representations_on_behalf_of_Crownhall_Estates_Ltd_V2.pdf (739 KB)

Comment ID: pslp171/1213  Respondent: 17380865 / Crownhall Estates (Sir or madam)  Agent: Turley (David Murray Cox)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1: PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

Whilst the inclusion of Policy S1 relating to the presumption in favour of sustainable development within the Proposed Submission Local Plan is supported, the ability of this Policy to operate as intended is questionable. As these representations highlight, the Proposed Submission Local Plan seeks to designate land currently designated as Countryside Beyond the Green Belt as being within the Green Belt. Consistent with the text of paragraph 14 of the NPPF, criterion 3(b) of Policy S1 states that permission will be granted unless (inter alia) specific policies in the Framework indicate that development should be restricted. Footnote 9 of the NPPF provides sets out policies, including Green Belt, which restrict development.

If the whole of the Borough (other than settlements and allocations and a small area to the west of Ash and Tongham) is to be within the Green Belt then this severely restricts the opportunities to apply the presumption in favour of sustainable development. This is reinforced by paragraph 4.1.4 of the Proposed Submission Local Plan which states: “In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.” (Our emphasis)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 PLANNING FOR THE BOROUGH – OUR SPATIAL DEVELOPMENT STRATEGY

These representations raise the following concerns with regards to Policy S2:
• The identified housing needs of Guildford Borough;
• The provision of housing for the unmet needs of neighbouring authorities;
• The phasing of development as set out in the Annual Housing Target table;

The identified housing needs of Guildford Borough

The current consultation version of the Local Plan proposes a new plan period of 2015 to 2034 and a reduced housing requirement of 12,426 (654 dwellings per annum). This represents a reduction of 1,434 dwellings compared to the previous consultation version of the Local Plan.

The West Surrey Strategic Housing Market Assessment was published in September 2015 and covered the authorities of Guildford, Waverley and Woking. This identified an annual requirement of 693 dwellings in Guildford, with 519 and 517 dwellings per annum for Waverley and Woking respectively. Clearly therefore the Council’s now proposed housing requirement falls short of the OAN for the Borough as established in the 2015 SHMA.

The Council have subsequently commissioned an Addendum Report to the SHMA (March 2017) in relation to Guildford Borough in isolation. The Addendum Report identifies an OAN for the Borough of 654 dwellings per annum and it is on the basis of this figure that the Local Plan has been prepared.

It is notable that West Oxfordshire District Council has recently sought to take a similar approach in its Local Plan Examination. The District Council independently prepared an update to the Oxfordshire SHMA on its OAN in isolation and sought to proceed on the basis of the reduced figure contained therein. This approach was not accepted by the Inspector as being sound and resulted in a lengthy suspension to the Examination to allow the Council sufficient time to undertake the necessary work to address meeting the higher OAN figure advocated in the County wide SHMA. Although the Examination has now resumed, this has resulted in over a twelve month delay in the process.

As such, given the recent experience of West Oxfordshire, it is considered that the Council’s current approach represents a significant risk to the soundness of the Plan.

Paragraph 2.4 of the SHMA addendum notes that there are significant affordability issues in the HMA. In this regard we note that the evidence indicates that these affordability issues are worsening (the 2017 addendum indicates that the affordable housing need has risen from 517 dpa to 552 dpa). We understand that the Council has retained the approach to applying an affordability uplift in the 2017 addendum that was used in the 2015 SHMA. Furthermore, we understand that this limits the uplift to one related to an adjustment to the household formation rates of younger households. We understand that this results in a 9% upward adjustment to the ‘starting point’ household projection. Given the existing and worsening affordability issues in the Borough, we consider that it is unreasonable to limit this uplift to 9%. In fact, we note that in the adjoining borough of Waverley, the Local Plan Part I Inspector has applied an uplift of 25%.

The 2017 addendum to the SHMA indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa. Whilst economic factors are an important consideration it is important that these are considered at a wider scale than an individual local authority level, as had been done under the previous SHMA but is not the case in the recent addendum. In addition it is noted that the demographic baseline and affordability issues
suggest an increase in OAN. As such it is considered the 2017 addendum to the SHMA is an inappropriate basis on which to Plan.

The provision of housing for the unmet needs of neighbouring authorities

At this stage, given the Council is failing to meet its own full OAN as calculated in the 2015 SHMA, the Council is also making no provision to meet the unmet needs of any adjoining authorities within the same Housing Market Area (for example Waverley and Woking Boroughs).

We understand that Woking Borough is continuing to plan on the basis of its Core Strategy requirement (292 dwellings per annum to 2027, in comparison to the OAN identified in the West Surrey SHMA 2015 of 517 dwellings per annum between 2013 - 2033) (therefore 225 dwellings fewer). The Waverley Local Plan Part 1 was originally prepared on the basis of meeting an OAN of 519 dwellings per annum; the Inspector’s consideration during the Examination has revealed that provision should be made for an OAN of at least 590 dwellings per annum. Furthermore, we understand the Waverley Local Plan Part 1 Inspector has concluded that provision should be made for a proportion of Woking’s unmet need within Waverley and Guildford Boroughs and that the Inspector settled on a figure of 83 dwellings per annum as being equivalent to half of Woking’s unmet need.

It is essential that consideration is given to how the unmet needs of Woking are to be provided for. A failure to make provision for this level of housing development would result in a shortfall of 225 dwellings per annum.

In addition, we consider that the Guildford Borough Local Plan should be prepared on the basis helping to provide for other authorities should the need arise. The Council’s proposal to designate a large part of the Borough as Green Belt further restricts the ability to cater for unmet housing needs arising from within the HMA.

The phasing of development as set out in the Annual Housing Target table

We note from the Annual Housing Target table contained within Policy S2 of the Guildford Borough Proposed Submission Local Plan that the housing requirement is to vary annually from 450 dwellings per annum upon adoption, rising to 850 homes per annum at the end of the Plan period. Paragraph 4.1.9a of the Proposed Submission Local Plan seeks to justify this approach on the basis of the likely rate of delivery, particularly on the strategic greenfield sites. In addition paragraph 4.1.9b of the Proposed Submission Local Plan explains that this “phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy.” Notwithstanding our specific concerns about this table (set out below), the Council’s approach to phasing raises a number of concerns.

The effect of the Council’s approach in this regard results in a situation where there is likely to be a shortfall in delivery of 204 dwellings per annum in the period from 2019 when compared to the objectively assessed need highlighted in the SHMA. This will lead to a situation whereby those in need of housing, in particular affordable housing, may not be able to access accommodation in the Borough until later in the Plan period. In such circumstance a proportion of the population may therefore be forced to find accommodation elsewhere and this approach could result in a situation which undermines aspirations for job and economic growth within the Borough as a result of a lack of available workforce for example. We are also concerned that the Council’s phased approach seeks higher delivery rates later in the plan period. Given that the emerging Local Plan is predicated on a number of large sites, there is a significant risk that if these do not come forward at the rate envisaged then there will be less time available to remedy any shortfalls.

The Housing Topic Paper (which accompanies the emerging Local Plan) acknowledges that housing delivery is a major issue for the Borough. However, paragraph 47 of the NPPF requires Local Planning Authorities to ‘boost significantly the supply of housing’ and the National Planning Practice Guidance states that they must ‘deal with undersupply within the first five years of the plan period where possible’. Guildford Borough Council has deemed this to not be possible within the Borough. The Council identifies that there will be an overall unmet need of 3,150 homes in the period (2013/2014 – 2026/2027). Far from dealing with an undersupply in the first five years of the Plan period, the Council’s approach seeks to delay the delivery of a significant proportion of the housing requirement. Consequentially this raises concerns over whether any accrued shortfalls can be resolved.

If the Council considers that housing delivery is a major issue within the Borough, then a greater range, scale and type of sites should be identified in order to aid delivery rates. Furthermore the paper identifies housing delivery within the first
five years of the emerging Local Plan period as another major issue. The paper states that a significant shortfall in sustainable sites remains, when taking account of the deficit accrued since 2015 and the 20% buffer; the buffer applied as a result of the persistent under delivery of housing in line with Paragraph 47 of the NPPF. The Council states that this will be resolved in the later periods of the Local Plan, in line with expected infrastructure delivery and through the development of strategic sites.

We do not consider that paragraphs 4.1.9a and 4.1.9b or the Housing Topic Paper justifies the Council’s phased approach to the delivery of housing during the Plan period. This is particularly the case because the assessment of sites has been constrained by the Council’s intention to designate large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt. This represents an artificial view of land availability in the Borough and predetermines conclusions as to the ability of the housing requirement to be met. We consider that if the Council had not adopted such a stance then it likely that additional opportunities would have been identified for housing development, including within the early part of the Plan period when the Council perceives there to be difficulties in delivering sufficient housing to meet the OAN.

The Land Availability Assessment June 2017 Addendum details the Council’s most up to date housing land supply position. The five year housing land supply position for 2016/2017 (which covers the monitoring period 1st April to 31st March 2018) is said to be 2.36 years based on the Council’s evidence, demonstrating a significant and severe deficit in housing supply. We consider that this position demonstrates the clear need to ensure that all available opportunities to identify sites to help meet the housing requirements in the Borough (including unmet needs arising within the wider Housing Market Area if necessary) are considered. The approach (explained in the previous paragraph) which arbitrarily restricts the availability of sites is fundamentally flawed.

Paragraph 4.1.9a of the Proposed Submission Local Plan states that the figures in the Annual Housing Target table (contained in Policy S2) “sum to a total of 12,426 dwellings.” We calculate that the figures sum to a total of 9,810 dwellings. It appears as though the figure of 12,426 is achieved then the period covered by the Annual Housing Target table should be expanded to cover the four years from 2015/16 to 2019/20. It is not clear why that part of the Plan period has been excluded from the table.

We note that paragraph 4.1.9a of the Proposed Submission Local Plan states: “This [the figure of 12,426] is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target.”

We consider that the Proposed Submission Local Plan does not include this flexibility despite the claim at paragraph 4.1.9a. The proposal to allocate additional land as Green Belt results in a situation whereby the presumption in favour of sustainable development is unlikely to apply to much of the Borough (by virtue of paragraph 4.1.4 of the Proposed Submission Local Plan and footnote 9 of the NPPF).

Within the Land Availability Assessment (2016), the Land north of Poyle Road, Tongham is identified as under the heading ‘Discounted Sites’ (under the reference 79), due to ‘suitability concerns regarding the proposal to designate the land as Green Belt as part of the new Local Plan development’. The Land Availability Assessment (2016) does not identify any other reasons why the site is unsuitable for development. It is unclear why the site has not been assessed for its suitability for housing development despite it not being designated as Green Belt at present. As these representations demonstrate, that approach results in an artificially constrained view of land availability and predetermines the position as to the availability of potential sites for housing delivery within the Borough.

There are various considerations that need to be addressed in regards to the Proposed Submission Local Plan and the level of unmet housing need, in particular the Council’s inability to demonstrate a five year housing supply and the strategy for delivering housing within the Proposed Submission Local Plan. In particular, with the five year supply shortage and an expected shortfall of sites within the early years of the Local Plan, the Council’s housing supply position can only be expected to worsen. Furthermore the Council’s reliance on strategic sites, in the latter half of the plan period could lead to longer term shortfalls or delays in housing supply if those sites fail to deliver at the rate expected. The housing supply shortfall and the Council’s reliance on large sites (delivering at the end of the Plan period) reinforces our view that the Council should seek to utilise a greater range of sites and in particular should not look to restrict development by designating large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt.
SUMMARY AND CONCLUSIONS

These representations set out key concerns regarding the Proposed Submission Local Plan. These key concerns relate to the delivery of housing to meet needs within Guildford Borough (and unmet needs from other authorities) during the plan period, the proposed phasing of development and the Council’s intention to designate large parts of the Borough (currently designated as Countryside Beyond the Green Belt) as Green Belt. Since the designation of land as Green Belt has significant implications for the operation of the presumption in favour of sustainable development, this intention has the potential to significantly restrict the delivery of housing during the plan period. Moreover, due to the requirement of the NPPF that Green Belt boundaries should endure beyond the Plan period, the Council’s intention is likely to restrict the ability of the area to accommodate housing development in the future, particularly since this land relates to areas at sustainable settlements such as Tongham.

The Council’s intention to designate the land to the north of Poyle Road, Tongham as Green Belt is flawed. This land does not contribute to the Green Belt purposes defined in the NPPF and reduces the capacity of a sustainable settlement to accommodate development. The Council’s approach of assessing sites on the basis that they are proposed to be designated as being within the Green Belt is fundamentally flawed and represents an artificially constrained view of housing land availability within the Borough. The flawed nature of this approach is highlighted by the fact that the Council is seeking to restrict the housing requirement earlier in the Plan period.

We consider that the land north of Poyle Road, Tongham which is the subject of a live application for up to 150 residential dwellings (GBC ref 17/P/01315) represents a sustainable location for development, adjacent to a sustainable settlement as defined by the Council’s own hierarchy. In addition this land is not subject to environmental restrictions in the adopted Local Plan which indicate that development cannot be accommodated. The site is not subject to any environmental or landscape designations and is not within the Green Belt. Although the land is proposed to be designated as Green Belt, the site does not perform the purposes of Green Belt as defined by the NPPF.

We consider that the concerns outlined in these representations result in the Proposed Submission Local Plan being unsound when assessed against paragraph 182 of the NPPF which requires a Plan to be positively prepared; justified; effective; and consistent with national policy.

In this case, the Proposed Submission Local Plan is unsound because:

• It is not positively prepared. No provision has been made for the unmet housing needs of other authorities and the Council’s approach to the Green Belt provides little opportunity to do so and little opportunity to resolve the existing housing supply shortfall. No provision has been made for the unmet housing needs of other authorities and the Council’s approach to the designation of additional Green Belt land provides no flexibility to do so. In addition, the Plan does not provide a situation whereby development can be accommodated by virtue of the presumption in favour of sustainable development as a result of the decision to designate additional land (at sustainable locations) as Green Belt and is of particular concern given the housing supply position in the Borough.

• It is not justified. The plan is not the most appropriate strategy when considered against the reasonable alternatives. The evidence does not support the identification of the Land north of Poyle Road, Tongham as being within the Green Belt. The decision to discount sites from further assessment due to the Council’s intention that they be designated as Green Belt is fundamentally flawed and represents an artificially constrained view of housing and land availability within the Borough.

• It is not effective. The Plan is not deliverable over the Plan period since it artificially restricts the availability of land within the Borough and results in a situation where the presumption in favour of sustainable development is unlikely to apply to much of the Borough.

• It is not consistent with national policy. The Local Plan does not meet the OAN and does not provide for the unmet needs of adjoining authorities and other areas. The Local Plan is also not prepared on the basis of planning for sustainable patterns of development and The intention to designate land, such as the land north of Poyle Road, Tongham is inconsistent with national policy as the land does not serve the Green Belt purposes. Moreover the Council’s approach to the designation of additional areas of Green Belt results in a situation where the permanence of the Green Belt cannot be maintained.
We can confirm that we intend to attend the Examination in order to address the matters contained in these representations.
We trust that these representations are useful and would be grateful for confirmation that they have been received and registered as being duly made.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3039</th>
<th>Respondent: 17381601 / Madeleine Stevens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the Policy A42 change at Clockbarn in Tannery Lane. The plan to build sixty homes is unacceptable. This is a 33% increase of the original amount of building on that site instead of a reduction of 33% which would at least be more realistic. Sixty houses would be far too many. Traffic problems in Tannery Lane would naturally increase and the risk of flooding would increase further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3041</th>
<th>Respondent: 17381601 / Madeleine Stevens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to Policy A58 at Burnt Common. I do not see why an industrial development is required when there are empty sites and industrial units at Slyfield and in Guildford?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1390</th>
<th>Respondent: 17381601 / Madeleine Stevens</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 2 at paragraph 4.3.15. Send Business Park should not be inset from greenbelt land. It is in a beautiful quiet rural lane in an area of outstanding natural beauty which is why we all have chosen to live and work here. There is highly restricted vehicular access along Tannery Lane in both directions as it is. This is, and should remain an area of outstanding beautiful countryside adjacent to the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/394  Respondent: 17381761 / Simon Runton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The West Horsley issues I object to are as follows:

- The council is not choosing to constrain its housing growth in Green Belt areas and the proposed developments still represent a large number of dwellings on Green Belt space, which was established to prevent urban sprawl not facilitate it. The continued submissions of the Local plan squarely fail to meet any of the infrastructure issues and relies on inaccurate information and excessive erosion of Green Belt land.

- I question the Council’s predictions for Guildford’s level of growth which is 25% more than the Office of National Statistics prediction for the area by 2034. Surely it is an error to base a plan on figures that differ so markedly from national forecasts and flawed evidence must not be relied upon to justify the inflated predictions.

- Nothing has been proposed since last years Consultation to improve sustainability of the West Horsley development sites and therefore meet the National policy requirements. The road network is already over used, in poor state, is prone to flooding in poor weather. The train station carparks are already full up at rush hour. The primary and secondary schools in the area have both applied for expansion to meet existing needs and these have been rejected. I therefore do not understand how an infrastructure that is over subscribed already can fit the further demand expected of 400 new homes in the area. The same applies for the Doctors surgery which is at capacity.

- I object to no changes being proposed since the 2016 consultation to insetting West Horsley from the Green Belt and welcome the reduction in the number of new homes being proposed, but the Local Plan does not go far enough to maintain Green Belt land.

- The number of proposed dwellings will fundamentally change the character of the village, yet Guildford town centre and brownfield sites appropriate for dwellings are being overlooked in preference for further retail space when many published studies show online retailing is growing at the expense of the high street.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Three Farms Meadows site proposal because:

- There are severe constraints with the A3 and M25, one of the most congested areas of road at one of the busiest motorway junctions in the country.

- Local road networks cannot sustain a development of that size with roads prone to flooding in poor weather, buses and lorries in Horsley do not have enough room to pass cars without them stopping or in too many instances, mounting the pavement.

- There is not enough employment opportunities on the site for a development of that size which will only lead to more cars and commuters adding to the severe congestion, because of this it is inappropriate to assume that the local roads will be fine for cycles instead. The roads are poorly lit, not big enough, in poor repair so cyclists who do use them often have to cycle further from the kerb for their own safety than the Highway Code recommends

- The proposed removal of over 3 hectares of Green Belt has been included without justification

- The significant modifications made to the plan mean that it should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

- The evidence base especially the West Surrey SHMA and the Guildford addendum 2017 has been challenged by other experts including NMSS.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the Three Farms Meadows site proposal because:

- There are severe constraints with the A3 and M25, one of the most congested areas of road at one of the busiest motorway junctions in the country.

- Local road networks cannot sustain a development of that size with roads prone to flooding in poor weather, buses and lorries in Horsley do not have enough room to pass cars without them stopping or in too many instances, mounting the pavement.

- There is not enough employment opportunities on the site for a development of that size which will only lead to more cars and commuters adding to the severe congestion, because of this it is inappropriate to assume that the local roads will be fine for cycles instead. The roads are poorly lit, not big enough, in poor repair so cyclists who do use them often have to cycle further from the kerb for their own safety than the Highway Code recommends

- The proposed removal of over 3 hectares of Green Belt has been included without justification

- The significant modifications made to the plan mean that it should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

- The evidence base especially the West Surrey SHMA and the Guildford addendum 2017 has been challenged by other experts including NMSS.
The eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt. It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done to protect Green Belt. The objectively assessed housing target, though reduced since 2016 to 12,466 homes, will by 2034 (the end of the Plan Period) mean that Guildford has grown by nearly 25%. This is nearly double the Office for National Statistics prediction for the growth of Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

Comment ID: pslp171/1393  
**Respondent:** 17381825 / O J S Malhouse  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Nothing has been put forward since last year's Consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements. Every home on the West Horsley sites will need a minimum of one car to enable residents to get to shops, medical centre, library and Horsley Station, regardless of how much pressure is applied to adopt cycling and walking as the preferred means of travel.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

Comment ID: pslp171/1391  
**Respondent:** 17381825 / O J S Malhouse  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The reduction in the number of new homes proposed in the Green Belt after the 2016 Consultation, is welcomed (90 in West Horsley, 1100 in Normandy and Flexford) but this still does not go far enough in reducing the still very large number of new dwellings proposed on Green Belt.

I also object that no changes have been included in the current draft Local Plan despite the strong adverse response to the 2016 Consultation regarding GBC's proposals that East Horsley and West Horsley should be inset from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I am particularly worried by the idea that a central bus-station could be dispensed with altogether - just having stops on streets. I object to this.

Infrastructure - Dl
Current infrastructure does not meet current needs so it is very worrying to see so much development being planned running ahead of the infrastructure. I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Land for Employment Use - E1, E2
Too much potential development land within the town centre is allocated for retail or commercial development instead of for housing. I object to this. It is not logical. It is against national trends and will serve to make the shortage of affordable housing and the appalling traffic and movement problems worse. The Burnt Common site is not suited to heavy industry and it is in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Land for Employment Use - E1, E2
Too much potential development land within the town centre is allocated for retail or commercial development instead of for housing. I object to this. It is not logical. It is against national trends and will serve to make the shortage of affordable housing and the appalling traffic and movement problems worse.

The Burnt Common site is not suited to heavy industry and it is in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1396  Respondent: 17382113 / T J Lindsay  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land Usage Density - H1 / H13
I object to the removal of the policy on land usage density. Please reinstate provision of the very important minimum and maximum land usage densities policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1397  Respondent: 17382113 / T J Lindsay  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Areas of Outstanding National Beauty - P1 and E5
The protection of AONB's appears to be weakened with the removal of restrictions (fltnon-major development. This is contrary to the responses from the public in previous consultations. I object to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1398  Respondent: 17382113 / T J Lindsay  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

The Green Belt - P2, P3, E5 and specific sites  
The changes do not show responsiveness to the weight of public opinion which is heavily against weakening these policies. I object to this. No attempt is made to demonstrate exceptional circumstances feeding in to the proposed figures quoted. Also, the Rural Economic Strategy covered in 4.51 a has as a main aim promoting affordable homes everywhere in the countryside - including in AONB. It could work as a mechanism to produce overdevelopment in the countryside. I object to this and it should be subjected to full public consultation. The three major strategic sites of Blackwell Farm, Wisley Airfield and Gosden Hill Farm are in the Green Belt. I object to them still being put forward. Previous consultations show that in line with the NPPF the public prefer the use of brownfield land in the urban area first for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3059  Respondent: 17382305 / Brian Austin  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new requirements set out in para. 9 of the infrastucture section for site A35 show how inadequate and unsuitable this site is and highlight the basic flaws in this proposal. Its proximity to the Thames Basin Heaths Special Protection Area and its scale will in reality be environmentally damaging despite the placebo of a SANG. The residents of such a site will all need at least one car per household, they will very largely have to commute to work and the proposals for alternative transport are not realistic. The proposals for local shops, school and medical centre will not materialise until late in the project and will no doubt be subject to the uncertain availability of funds at that time.. In the meantime the development will place an unacceptable burden on the already stretched infrastructure of surrounding communities. In particular it is highly questionable whether the proposed bus service will prove economically viable and it will in any case be unsuitable for the narrow local roads. There is nothing sustainable about this proposal and it continues to be folly to build such a car dependent site next to two already overloaded main roads, the M25 and the A3 whose problems are acknowledged elsewhere in the plan (para 2.14a)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3060  Respondent: 17382305 / Brian Austin  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A38</td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the fact that no changes have been made to the proposals to inset East and West Horsley from the Green Belt since the 2016 Consultation.

I object to the proposal to move the boundary of East Horsley’s area of residential settlement south of the A246. This proposal has not been justified and appears arbitrary. This area abuts the Surrey Hills AONB and raises the prospect of inappropriate development in this sensitive area.

I object to the fact that though new paragraph 2.10b places emphasis on the need for adequate infrastructure to be in place this has not been applied to East or West Horsley. Though the dropping of sites A36 and A41 is welcome the proposals still mean an extra 255 new houses for West Horsley, an increase of some 25%. There are no proposals for any improvements or additions to an infrastructure which is already stretched with waiting lists at all levels for the local primary school, substantial waiting times for appointments at the local medical centre and parking at Horsley railway station at its limit on normal working days. I therefore object to the proposals for sites A37, A38, A39 and A40.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1402</th>
<th><strong>Respondent:</strong> 17382305 / Brian Austin</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the policy of insetting villages and removing site A35 from the Metropolitan Green Belt and in particular the imbalance of proposed development which results in proportionately more damage being done to the Green Belt in the North East of the borough. This is the area crucial to the purpose of the Metropolitan Green Belt in containing the spread of London. The retention of site A35 as a strategic site despite its low sustainability rating while dropping site A46 at Normandy exacerbates this imbalance and I object to it as an error of judgement.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/261</th>
<th><strong>Respondent:</strong> 17382305 / Brian Austin</th>
<th><strong>Agent:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to the housing need statistics on which the plan is based as unsound. The projection for new houses over the plan period amounts to an increase of over 20% yet the Office for National Statistics (ONS) projection is for a population growth of some 10%, why is there this discrepancy? The ONS projection was based on trends before the Brexit vote and on present indications there is a high risk that Brexit will result in the growth of both the economy and population becoming negative. The plan has not been adjusted for this possibility and with the likelihood that there will be a shortage of both private and public funds for investment in development and infrastructure proceeding with the present plan looks unjustified and unwise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3049  Respondent: 17382401 / Mark Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I completely oppose the increase in number of houses proposed for development, from 1200 to 1750. How can this area cope with all these homes? This will certainly push Ash Green into the ATUA and contradict entirely Policy P3 of the countryside. For this reason Requirement 6 that looks at protecting the historic location of Ash Green is not good enough and needs to be as follows....

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

I also feel that Requirement 8 does not give enough protection to Ash Manor. These collection of buildings are Grade 2 listed, once part of a historical farmstead and is steeped in history. I'm aware that the council aim to protect and enhance historical and heritage sites. The history of this site may not be widely known but there is a lot of information on this old farmstead kept in the Library of Winchester College. It's history is fully documented. I urge the council to respect and protect Ash Manor's history and amend it's draft requirements as follows....

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."
With regards to requirement 9, of the proposed bridge at Ash Station to deal with increase in traffic from potential new builds of the A29 policy, this must be in place before any development goes ahead. Otherwise there will be poor and inadequate infrastructure in place and thus the area would be unable to cope.

Requirement 9 does not take into account Tonghams’ The Street, A331/A323 intersection and A31/White Lane Junction as these roads will not cope with the even higher increase of traffic that would come from A29 development.

I would like to reiterate my strong beliefs and concerns of the Local Draft Plan. The area of Ash Green drafted into the ATUA is Ash Green and NOT Ash. We are the people that live here and for many years. We can say first hand what it is like in this rural area and we will see it slowly being destroyed. Please don't split us in half and dissolve our rural community into an urban area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8
"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:

Comment ID: pslp171/1403  Respondent: 17382401 / Mark Chandler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Ash Green all my life. I live in Ash Green Road and it is part of Ash Green. This area is rural. I live opposite the fields to Ash Manor and the road I live on is rural. In the late summer our road is busy with tractors and agricultural vehicles from the nearby farm harvesting their crop.

This part of Ash Green I live in is not part of the Ash and Tongham Urban Area (ATUA) and so the boundary should not extend south of Ash Green Road and Foreman Road.

For this reason could section 4.3.29 be amended to...

"Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham Urban area has grown considerably in size and now forms Guildford Borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development".
Please amend section 4.3.30 to.....

"We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Please amend Policy P3 to read...

"does not lead to greater physical or visual coalescence between the Ash and Tongham urban area. Ash Green and Aldershot."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

For this reason could section 4.3.29 be amended to...

"Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham Urban area has grown considerably in size and now forms Guildford Borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development".

Please amend section 4.3.30 to.....

"We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Please amend Policy P3 to read...

"does not lead to greater physical or visual coalescence between the Ash and Tongham urban area. Ash Green and Aldershot."

Attached documents:

---

Comment ID: pslp173/399  Respondent: 17383969 / Maureen Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing Send Business Park from the Green Belt (4.3.15):

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF, can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3079  Respondent: 17383969 / Maureen Mitchell  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield site (A34) from the Plan:

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3080  Respondent: 17383969 / Maureen Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan:

Site A4 has been removed. This is within the town centre and therefore with sustainable infrastructure and would make use of a brownfield site in need of redevelopment. The Plan has removed housing from the site in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is an unacceptable trade off.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3082  Respondent: 17383969 / Maureen Mitchell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase in housing proposed in Tannery Lane (site A42):

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3083</th>
<th>Respondent: 17383969 / Maureen Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the hiding of development by ‘deferment’ (A24, A25, A26, A43):

This version of the Plan has concealed some development planned to take place by ‘deferring’ it beyond the period covered by the Local Plan. This has two effects:

1. to hide the number of houses actually being built (A24, A25, A26 – total of 1,100 deferred, but still being built), and
2. to give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3084</th>
<th>Respondent: 17383969 / Maureen Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the extended development in the Green Belt (Policy P2, Site A43):

I object to Garlicks Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of six Travelling Showpeople sites in A34 Garlicks Arch:

The allocation of six Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3081</th>
<th>Respondent:</th>
<th>17383969 / Maureen Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the unfair imbalance of the Plan across the borough:

With the removal of site A46 from the Plan (with its proposed 1,100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough, the Plan has become even more biased against the North East of the borough. Guildford Borough is an area of more than 100 square miles. Of the11,350 homes proposed in the Plan, 40.6 per cent (4,613) are within three miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3089</th>
<th>Respondent:</th>
<th>17383969 / Maureen Mitchell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Sound?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>is Legally Compliant?</td>
<td>( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlicks Arch to be included.

I object to the proposal for a Waste Management Facility in Green Belt (A58):

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1413  Respondent: 17383969 / Maureen Mitchell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy on affordable homes (Policy 4.2.23):

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”. The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t have to provide any ‘affordable’ homes - just make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [ie a reason for not delivering affordable houses]. That has now been removed, thereby implying that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is shocking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp17q/264  Respondent: 17383969 / Maureen Mitchell  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3109  Respondent: 17392513 / Katherine Aaronson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly support the withdrawal of Policies A46 and A47 from the Local Plan, which will help to preserve the hugely valuable ‘openness’ of the settlements included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3110  Respondent: 17392513 / Katherine Aaronson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am concerned that huge extensions to settlement boundaries are being proposed in many villages, as well as infilling outside of settlement boundaries in a further 11 villages. I object on both counts.

I strongly object to the proposed ‘insetting’ of the settlements at Normandy, Flexford and Walden Cottages, as well as of the Travelling Show-people site at Whittles Drive (Policy/Site A50) and of the Traveller site at Palm House Nurseries (Policy/Site A49). These sites contribute to the openness of the Green Belt (as evidenced in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/2140630 and APP/Y3615/A/10/2131590). Furthermore, as per paragraph 10.7.7 of the Sustainability Assessment the agricultural land between these settlements demonstrates ‘openness’ and makes an important contribution to the rural economy. In addition, land in and around the Flexford and Normandy settlements helps maintain views into and from the Surrey Hills Area of Outstanding Natural Beauty at the Hog’s Back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1423</th>
<th>Respondent: 17392513 / Katherine Aaronson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I also object to the statement under Green Belt Policy P2 (4.3.13) claiming that Flexford, Normandy, and a list of 12 further villages are “now inset from the Green Belt”. This statement is untrue – GBC is proposing that these settlements are inset but a decision has not yet been made by an Inspector, and therefore these villages rightly remain in the Green Belt.

Policies P2, P3 and E5 and sites fail to demonstrate the exceptional circumstances required to develop Green Belt land. Despite the strength of public opinion against a weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. This is clearly not an exception and no effort is made to demonstrate the previously mentioned exceptional circumstances in line with NPPF requirements.

At a general level, I object to the failure of Policy P2 to appreciate the importance and permanence of the Metropolitan Green Belt, and the need to protect is permanently. The Green Belt is critical to safeguarding our countryside and green spaces, limiting urban sprawl, and preventing towns from merging. It also encourages the recycling of derelict and other brown field urban sites, helping to assist with urban regeneration. It must be protected and I do not believe Policy P2 adequately reflects this. It also fails to include any assessment of the value of the Green Belt, which is rich in natural and social capital.

Finally, I object to proposals in Policies P1 and E5 weakening protections for AONB which fail to restrict non-major development. This fails to strengthen and in fact weakens protections offered to AONB it is crucial we maintain, and is contrary to the huge weight of public opinion expressed in previous consultations, and the protections made in the NPPF to AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp173/402 | Respondent: 17392609 / Joyce Chandler | Agent: |
Firstly I would like to stress, as a resident of Ash Green, we are in Ash Green. I have lived here for over 40 years and never known boundaries to change, or the community you live in segregated.

I can see on the map of the Local Plan draft there is a blue line that cuts Ash Green in half. The council need to take into account the importance of the countryside and our rural homesteads. They need to be protected or they will be lost forever. I would like to finish this letter with a final comment. The whole of this community feel very strongly about Ash Greens rural identity and feel extremely under threat from mass development. We are a close nit community with different groups and social activities that we attend. We care about where we live and would hope for support as a rural community from the Guildford Borough council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3111  Respondent: 17392609 / Joyce Chandler  Agent:

My next comments and objections are in relation to Policy A29. Looking at the first section of the policy, you have increased the already large amount of houses to be built in the area stated. This will completely push the ATUA into our rural area and as I have mentioned before this must be kept separated. You cannot destroy any remaining rural communities or countryside as this will be lost. Ash Green as a rural community must be protected.

You only need to look at an aerial map that views Ash and Ash Green and compare how hugely built up and compact Ash is in contrast to Ash Green which is rural homes, trees and fields. In between Ash and Ash Green you have Ash Manor which has a lot of history.

I totally appreciate the need for new homes and accept that there will be development in our community, but not on large scales and not on inappropriate land. Ash Manor (historically part of Ash Green) is not suitable as it is a group of grade 2 listed buildings surrounded by fields. Building on theses fields as marked out in pink on A29 will destroy it's historical standing and heritage. A28 is more appropriate.

Please amend wording Requirements 6 and 8 to give Ash Greens historical location and rural character more protection, protect the historical Ash Manor and prevent Ash Green from being dissolved into urban Ash.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/1425</th>
<th>Respondent: 17392609 / Joyce Chandler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P3</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I can see in your Policy P3 that it is about the countryside. I would like object to the current wording and see amendments that gives Ash Green more protection from inappropriate and over development, protect Ash Green as a rural community and not join us in to the Ash and Tongham Urban Area (ATUA). It also needs to preserve it's role in maintaining a separation of identity to Ash and Tongham. I would also like to see Ash Manor as a buffer between the rural Ash Green and Urban Ash.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3128</th>
<th>Respondent: 17395073 / David Palmer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. <strong>Removal of sites A46 &amp; A47</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I support the removal of these sites owing to the inability of the existing infrastructure (ie roads, wastewater, sewage, flooding, electricity supply and healthcare) to cope with developments of this magnitude and also that it is Green Belt land.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3129</th>
<th>Respondent: 17395073 / David Palmer</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A47</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. **Removal of sites A46 & A47**

I support the removal of these sites owing to the inability of the existing infrastructure (ie roads, wastewater, sewage, flooding, electricity supply and healthcare) to cope with developments of this magnitude and also that it is Green Belt land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3143  **Respondent:** 17397729 / D Wilson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing in SUPPORT to the removal of sites A46 and A47 from the GBC Local Plan 2017.

Our key points in support of the removal of these 2 sites are:

1. Inability of the infrastructure to cope with the development of this magnitude (roads, wastewater, sewage, flooding, electricity supply and healthcare) and the fact that this is Green Belt land. We object to the removal of Green Belt as it could enable development within this area at a much higher density as this area contributes to the “openness of the Green Belt.”

2. In our 11 years of living at number 28 The Paddocks, we have seen on many occasions the pond (a Roman pond of Special Scientific Interest) on the property of Little Flexford, burst its banks and flooding in bad weather. Also the rear field of the proposed development site and to the east of The Paddocks again floods during bad weather, making its own substantial pond.

If the proposals do not cater for the flooding, the result will be that part, if not all, of the proposed development will flood and / or the excess water will drain into the pond at Little Flexford.

This will not only potentially flood the property known as Little Flexford, but the surrounding properties as well, as this is the lowest point in the area.

With climate change (global warming) becoming such a concern and issue, as consistently pointed out in the media, it surely must be essential and necessary that any new and/or existing homes are not subjected to flooding due to any new development on the land east to The Paddocks.

3. Employment within Normandy. There is an extremely serious lack of employment within Normandy village itself. Small companies don’t have a large workforce – a workforce that drives to Normandy to work for a small company. All medium to large sized companies are based in Guildford, a 6 mile drive, bus ride or train ride.

4. Disproportionate and unsustainable development

5. 100% increase in the number of homes in Normandy that will rip the rural heart our of this village and destroy our rural environment

6. Unsubstantiated claims that this will lead to an improvement in services for existing residents
7. Unconstrained annual house building in Guildford, surrounding local authorities apply constraints to their annual housing number due to their Green Belt, while ours is concreted over

8. The erosion of our green belt and the extinguishing of rural Normandy and Flexford

9. The hamlets of Normandy and Flexford merged into one conurbation with no open spaces in between

10. All this completely developer-led, without any respect for the principles of town and country planning.

11. The destruction of our rural environment.

12. Changing green fields into one large urban sprawl.

13. Adding to creeping suburbanisation of the local area.

14. Destruction of our hedgerows and grasslands, causing the devastation and alarming decline in our bird and bee populations.

15. Loss of valuable pasture and arable farmland; in the last 6 to 7 years the UK has lost over 2000 square kilometres of valuable agricultural land to developers.

16. Urbanisation threatening the rare birds of the Thames Basin Heaths only 1 km away from the proposed development.

17. Urban lighting next to Ancient Woodland, light pollution starkly visible from Surrey Hills AONB.

18. Traffic chaos as indicated by the Surrey County Council traffic simulations.

19. Rushmoor expansion generating huge volumes of commuter journeys from outside the borough through our roads.

20. Compounding traffic congestion in the surrounding road and communities.

21. Vast numbers of homes boxed in by a single lane railway bridge, the junctions on the A323 at Glaziers Lane and Westwood Lane.

22. Increasing traffic from homes proposed

23. Our local roads and “A” routes grinding to a halt at peak times with massively increased exhaust pollution of NoX and CO2 threatening the health of our older people and children.

24. Protect the “open” character of Flexford and Normandy.

25. Ignoring past verdicts of planning inspectors that our green fields contribute to the “openness” of the Green Belt.

26. Reduction of environmental damage and a more sustainable future.

27. We need homes to be built on brownfield sites first, more homes to be built in Guildford Town, close to the station and central services. More redundant energy hungry offices in Guildford to be turned into homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Executive Summary

This set of representations are made on behalf of Countryside Properties PLC to Guildford Borough Council’s (GBC) Proposed Submission Local Plan: Strategy and Sites (June 2017). The representations are made in response to the Council’s decision to exclude Land South of New Pond Road Farncombe (Land Availability Assessment Ref: 2241) as a residential allocation in the Regulation 19 Proposed Submission Local Plan. The site was previously identified as part of a residential allocation (number 80) within the 2014 Draft Local Plan.

Our representations address the following key matters

• The lack of any justification for the Council seeking to reduce the length of the Plan period.
• Worsening affordability issues in Guildford Borough together with a failure to make and appropriate uplift to the OAN to take account of the very high affordable housing requirement that has been identified, and in-migration from London.
• The Council’s very poor 5 year Housing Land Supply and recent housing completions record.
• The urgent need to boost Guildford’s housing supply by bringing forward sites lacking in serious constraints.
• The complete absence of any commitment or strategy to help address and tackle unmet need within the wider Housing Market Area, in particular, with regard to Woking, being a failure under the Duty to Co-operate.
• There being an undue focus in the Local Plan upon very low Annual Housing Targets set in the early years of the Plan period solely to ensure that the Council maintains a 5 Year Land Supply. This being at the expense of significantly boosting the housing supply and tackling its Objectively Assessed Need (OAN). Particularly given that the stated target figures fail to meet the Council’s identified overall housing target figure.
• As a consequence of the Draft Plan placing a very heavy over-reliance on development at the back end of the Plan period, it is not considered to be in accordance with the national policy guidance.
• The valuable contribution that our client’s site at New Pond Road, Farncombe can make to boosting the Council’s 5 Year Land Supply is discussed.

Representations on Policy S2: Borough Wide Strategy

Introduction

1. These representations are submitted on behalf of our client CountrysideProperties (PLC) and relate to the Guildford Borough Proposed Submission Local Plan Strategies and Sites document (June 2017) and supplement our earlier comments with regard to the June 2016 consultation. These earlier representations contain a suite of detailed evidence which includes the following documents:

   • JBPA Promotional Brochure;
   • Barton Willmore Landscape & Visual Appraisal;
   • Barton Willmore Site Comparison Study;
   • JBPA Site Comparison Study;
   • Cgms Archaeological Desk Based Assessment;
   • Cgms Heritage Statement;
   • Amazi Flood Risk Assessment;
   • PJC Extended Phase 1 Habitat Survey;
   • RGP Transport Statement Technical Note; and
   • Rural Solutions Sustainability Appraisal.

2. Representations were also previously submitted at the Regulation 18 stage in November 2013 in relation to the Guildford Borough Local Plan Strategy and Sites Issues and Options document and in September 2014 at the Draft Plan stage.
3. We comment in these representations on the following matters:

- The inappropriateness of a reduced housing requirement figure;
- Inadequate Annual Housing Targets;
- A failure to address urgent affordability and lack of housing supply pressures;
- The lack of justification for the reduction in the proposed length of the Plan period;
- The unacceptability of back-loading housing provision to the end of the Plan period;
- A failure of the Duty to Co-operate in terms of addressing unmet housing need; and
- Support for the deletion of the proposed housing allocation at Normandy, but criticisms of other elements of the identified housing supply.

4. Our client controls land South of New Pond Road, Farncombe (see Appendix 1 – Site Location Plan). The site is capable of delivering circa 90 dwellings in the short term and could therefore contribute to Guildford Borough Council (GBC)’s 5 Year Housing Land Supply. Indeed, in 2014 a previous version of the emerging Guilford Local Plan identified the site as a part of a proposed housing allocation number 80 (see Appendix 2 – Proposed Housing Allocation Plan), which shows the boundaries of the housing allocation proposed in the 2014 version of the Draft Local Plan, however it was subsequently removed as the Council considered that the site (number 80) was no longer required as a proposed housing allocation. We outline below why we consider GBC’s stance to be wrong with respect to this matter.

5. Site number 80 is comprised of three parcels of land. The furthest west is land that we are promoting on behalf of our client Countryside Properties). To the east, in the central part of the site, is land associated with New Pond Cottage and New Pond Farm. The furthest east is land promoted by Obsidian Land Promotion (Guildford) Ltd on behalf of Podger Estate. Our previously submitted Landscape and Visual Appraisal by Barton Willmore (July 2016) found that New Pond Road provides a strong and robust physical feature on the ground that makes a limited contribution to the four assessed Green Belt purposes. It also makes a limited contribution to the (defined) special qualities that are intrinsic to designating an AONB. The Site is well located to existing local shops and services, schools and is considered to meet the three dimensions of Sustainable Development.

Plan Period

6. The latest (June 2017) version of the Proposed Submission Draft Local Plan proposes to amend the Plan period to 2015-34 from 2013-33. Consequently, there is a reduction of 1,434 dwellings, and the Plan period is reduced by a year. We fail to see what justification there is for GBC’s decision to reduce the length of the Plan period and roll its start date forward by 2 years. There does not appear to be any rational explanation offered to indicate why a reduction in the Plan period (which reduces both long-term certainty as well as the total overall identified housing supply) is either necessary or appropriate.

7. The change to the plan period to 2013 - 2032 seems somewhat arbitrary, particularly given that the SHMA modelling for the Housing Market Area (HMA) relates to 2013 to 2033, which continues to form an essential part of the evidence base for the emerging Local Plan.

SHMA

8. Paragraph 2.9 of GBC’s Topic Paper: Housing Delivery (TPHD) states that the West Surrey SHMA: Guildford Addendum Report (2017) provides a factual update to the West Surrey SHMA (2015). The Addendum sits alongside and supplements the West Surrey SHMA. It takes account of the latest population and household projections, the latest post-Brexit economic projections and the latest 2015 midyear population estimate. This factual update has resulted in a reduced Objectively Assessed Need (OAN) for Guildford from 693 homes per year (2013 – 2033) to 654 homes per year (2015 – 2034). Over the Plan period, this has resulted in a reduction of approximately 1,400 homes. There were 381 homes completed in 2015/16 and 297 in 2016/17 which has resulted in an under delivery of new homes against OAN, leading to an expected backlog of 1,319 dwellings by the time of the Local Plan’s adoption.

9. It is important to note that the West Surrey Strategic Housing Market Assessment (SHMA): Guildford Addendum Report (March 2017), prepared by GL Hearn, has been solely commissioned by GBC. Therefore, it solely seeks to address Guildford’s housing needs without due consideration of wider needs across the HMA and brings into question the effectiveness of the Duty to Co-operate requirements.
10. The Planning Practice Guidance (PPG) indicates that the most up-to-date household projection figures should be used as the starting-point in determining the OAN. In this case it is the 2014-based figures.

[See attachment for Tables]

11. The above two tables indicate that both the CLG Household Projections and Sub National Population Projections (SNPP) for 2014 show increases upon the 2012 based household and population figures. It is noteworthy that despite the 2012 based figures being used as the basis for the 2015 SHMA, and the more recent 2014-based figures underpinning the 2016 SHMA Update, GBC is now seeking to reduce the emerging Plan’s overall housing requirement figure.

12. The 2016 version of the Draft Plan makes reference (paragraph 2.21) to Guildford’s average house price needing to now being amended to £445,524 from £407,160, which fully demonstrates the urgent need to address housing delivery. This points to the fact that smaller less constrained sites such as the one being promoted on behalf of our client at Farncombe, can play a very important role in boosting housing supply in the short term to take account for longer lead in times for larger strategic development sites. Consequently, we consider that GBC’s proposed phasing timetable of the Borough’s housing provision to be seriously defective given that it will harm rather than assist in boosting the delivery of the Submission Draft Plan’s identified housing supply.

13. Table 24 in the updated SHMA (2017) indicates that 517 households per annum require support in meeting their housing need (compared to 478 in the 2015 SHMA).

14. Paragraph 5.23 states that with 40% affordable housing delivery, 1,293 dwellings pa would be required in order to address the affordable housing need in full.

15. Other important findings from the Assessment were:

- Land values are 16% above the Housing Market Area (HMA) average;
- Annual house price growth of 7.5% occurred over the past 5 years in Guildford;
- There has been a substantial £45,000 increase in average house prices in Guildford over the past year (paragraph 5.34);
- Lower quartile house prices are 11.5 x earnings in the Borough;

16. Reference is made in paragraph 5.49 to 629 dpa being required to support the rebased SNPP. To support economic growth, a marginally higher level of provision (631 dpa) would be needed. However, paragraph 8.17 goes on to state that applying a market signals adjustment to the economic-led need for 579 dpa results in an upward adjustment of 9%, increasing the assessed housing need to 631 dpa.

17. It is not evident why the 579 dpa figure, has been used in preference to the 631 dpa requirement.

18. Furthermore, given the findings of the updated SHMA (2017), which are referred to above, in particular, the market signals showing a housing market experiencing extremely severe affordability issues, only a very modest uplift of 9% above the economic-led need of 579 dpa is deemed sufficient. The identified OAN of 654 dpa is stated in paragraph 8.21 as being 17% above the starting point demographic objections. This increase is very low in comparison with the final OAN’s of many other recently published SHMA’s, and the OAN adjustments recommended in Local Plan Examination Inspector Reports. Most recently, the Inspector examining the Waverly Borough Council Local Plan indicated during the Hearing Sessions that an upward adjustment of at least 20% is likely to be applied.

19. We refer back to the evidence which we submitted to the 2016 emerging Local Plan consultation. In particular, the Nathaniel Litchfield & Partners report (July 2016) that criticised the methodology of the SHMA. The findings of which remain applicable.

**OAN**

20. The OAN Housing Target has changed to 12,426 dwellings (previously 13,860 dwellings). The Housing Target equates to 654 dpa in accordance with the SHMA Addendum (2017) (previously 693 dpa in accordance with the West Surrey SHMA – September 2015).
21. GBC states in paragraph 4.6 of the TPHD that for the purposes of its plan-making process, it has assumed an unmet housing need for Woking of 3,150 homes (2013/14 – 2026/27). This figure was recently been agreed by the Inspector and interested parties at the Waverley Local Plan Examination Hearing Sessions.

22. In our previous representations we referred to the unmet need arising from Woking, which has been assumed to be 3,150 dwellings for the period 2013/14 – 2026/27. The Inspector at the Waverley Local Plan Hearing Sessions confirmed his position that Waverley Borough Council and GBC would be required to accommodate unmet need from Woking. GBC should therefore seek to establish what proportion of this can be accommodated within Guildford.

23. There also appears to be a notable lack of information with regard to whether or not there will be any further amount of unmet housing need from Woking, beyond 2027, which might also need to be met by Guildford in the latter part of its Plan period.

24. We are disappointed that the Council is seeking to reduce its overall housing requirement by 1,400 dwellings in the 2017 Proposed Submission Draft Local Plan. The 2017 Addendum to the SHMA now indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa.

25. We consider that undue weight has been given to employment forecasts, particularly given that these only relate to Guildford, rather than the wider HMA. This is contrary to the Planning Practice Guidance (PPG) which specifies that employment trends and growth in working age population should be considered across the HMA.

26. It is also considered important to recognise other economic factors that are highly pertinent in determining the OAN. The demographic baseline and affordability issues point towards a need for an increase, rather than a decrease, to the OAN. The baseline level of housing need in the Borough, as identified in the 2017 SHMA Addendum, has risen from 517 dpa to 552 dpa. It must also be recognised that this is the mid-point assessment with the highest demographic projection being 584 dpa.

27. We referred in our 2016 Draft Local Plan representations to deficiencies in the production of the original SHMA. We would refer back to our earlier submission, in particular, the Nathaniel Litchfield & Partners Report (July 2016) that presented a critique of its methodology.

28. There is clearly an increasing need for housing within the Borough. Table 24 in the 2017 SHMA Addendum shows the need for affordable housing has increased from 478 dpa to 517 dpa. Table 25 refers to continued house price inflation of 7.5% per annum over the last 5 years, with an 11.4% increase over the past year. Paragraph 5.32 acknowledges that “It is clear that house price growth has accelerated in the Borough since mid-2013”.

29. Recent levels of housing delivery have been weak in the Borough. As a result, increasing demand and worsening affordability have contributed to making the Borough housing increasingly inaccessible for many of its residents. This is also demonstrated by the 2017 SHMA Addendum which reports that the number of households being formed by the crucial 25 - 34 age group have reduced.

30. Clearly there are affordability pressures that are reducing household formation in this age bracket. Poor housing delivery in Guildford Borough has compounded this situation. This worsening scenario has led to the situation identified in paragraph 5.27 of the 2017 SHMA Addendum which indicates that lower quartile house prices are 11.5 times the lower quartile earnings in the Borough. Market signals would suggest the need for a more significant uplift on the latest demographic baseline, rather than the reduction that is being proposed by GBC.

31. We also continue to consider that the Plan fails to make adequate provision for population flows from London given the capital’s sky-high property prices and Guildford’s close proximity. Please see our 2016 Local Plan representations for further details. These included evidence that In-migration from London indicated that more than 1,000 dwellings would be required in Guildford and up to 1,200 dwellings across the West Surrey HMA. It is important to remember that the Inspector’s Report in respect of the London Plan concluded that the London Authorities could not meet their Objectively Assessed Need for 52,000 dpa, nor their target of 49,000 dpa. Instead, there was found to be an identified capacity figure of only 42,000 dpa. It is important that GBC can demonstrate it is taking proper account of any contribution required in response to assisting in meeting housing needs arising from London, including emerging evidence being made available as part of the evidence base for the new London Plan.
32. We comment below upon the content of the following Table which is now shown as deleted text under revised Policy S2. The Table sets out the Annual Housing Target figures from the 2016 Submission Draft Version of the Guildford Local Plan. [See attachment for Table 3]

33. The previous 2016 Submission Draft OAN of 693 pa required provision of 13,860 dwellings over the Plan period. It is apparent from the above Table that GBC’s annual housing target figures would deliver 10,395 dwellings. In addition, 1,057 dwelling completions can be added for the first three years of the originally proposed Plan period (2013/14, 2014/15, 2015/16 & 2016/17). This would have provided a total of 11,452 dwellings. This would have still left a deficit of 2,408 dwellings to meet the OAN for the Plan period which would have needed to be bridged by an extremely high housing target figure in 2017/18.

34. Rather than an annual target applicable to each year of the Plan period, the housing supply is phased in order to show a 5 year land supply. The initial Annual Housing Target figures are very low. They appear to have been chosen entirely as a means of ensuring that GBC can maintain a 5 Year Land Supply (albeit a very low one). They are incapable of boosting short-term housing supply or addressing affordability concerns and poor recent completion numbers.

35. It is also worth noting that in the first 5 years of the Plan post adoption, the annual housing targets would have delivered 2,950 dwellings, or an average of 590 dpa.

36. The following Table is now shown as proposed new text under revised Policy S2. The Table sets out the Annual Housing Target figures from the 2017 Submission Draft Version of the Guildford Local Plan. It shows that it will take until the late 2020’s before housing delivery rates rise significantly above the OAN target of 654 dpa. [See attachment for Table 4]

37. The proposed 2017 Submission Draft OAN of 654 pa results in a required provision of 12,426 dwellings over the Plan period. It is apparent from the above Table that GBC’s annual housing target figures would deliver 9,810 dwellings. In addition, 381 dwelling completions can be added for the initial year of the revised proposed Plan period (2015/16) and 297 completions for the second year (2016/17). This would have provided a total of 10,488 dwellings. This still leaves a deficit of 1,938 dwellings to meet the OAN for the Plan period which will need to be bridged by the housing target figures for 2017/18 and 2018/19. This will require housing target rates of 969 dwellings in both of these years. It is not apparent how this step-change in delivery will be achieved prior to the new Local Plan being adopted.

38. Paragraph 4.1.9a in the 2017 Draft Submission Local Plan clearly states that “the figures set out in the Annual Housing Target table sum to a total of 12,426 homes”. This statement is quite clearly inaccurate given that as we have already stated above, the Council’s total identified housing supply only amounts to 9,810 dwellings. GBC needs to urgently clarify how its annual housing targets will actually address and deliver its OAN.

39. In the first 5 years of the Plan post adoption, the annual housing targets will now only provide for 2,400 dwellings, or an average of 480 dpa. This is a significant reduction in housing delivery against the already low figure of 2,950 dwellings (an average 590 dpa) proposed in the 2016 version of the Submission Draft Local Plan.

40. Given recent poor housing delivery rates, worsening affordability and a significant current unmet housing need within the HMA, we are concerned that GBC is seeking to reduce the OAN and introduce even lower annual housing targets in the early years of the Plan period. Such an approach is not considered sound as it is contrary to the National Planning Policy Framework (NPPF). It will not seek to significantly boost the supply of existing housing. Nor will it seek to address the significant housing supply backlog that will have accrued by the time of the Plan’s adoption.

41. Instead, the proposed strategy with its amended Annual Housing Targets in Policy S1 now places even greater emphasis on back-ended housing delivery towards the finish of the Plan period. This is a high-risk approach as it means there is a greater risk that the Plan will fail to meet its housing requirement should any of its major sites allocations fail to deliver as envisaged. In such circumstances, GBC will have much less time to address and rectify such shortfalls in delivery. This is an especially important issue given that GBC openly acknowledges in its evidence that a number of its site allocations are heavily dependent upon new infrastructure provision.

42. The proposed Annual Housing Target figures seems to be an attempt by GBC to delay delivery and not seek to meet housing need earlier in the Plan period, particularly given that that need has been significantly increasing. The Council
must identify a wider range of sites and in particular smaller sites, which can deliver housing in the short term. The Housing White Paper (HWP) recognised the importance of smaller sites to maintaining consistent supply.

43. GBC is not explicit in the Topic Paper: Housing Delivery – June 2017 (TPHD) whether it is proposing to use the Sedgefield or Liverpool approach to assessing five year supply. However, the statement in paragraph 4.188 appears to suggest that it will be seeking to address backlog over the full Plan period (The Liverpool method). This is not the approach favoured in the National Planning Practice Guidance (NPPG). We can see no reason why allocated sites should not be brought forward as early as possible.

44. Our view is that, in accordance with national policy, the Sedgefield method is used to ensure that the backlog is delivered as quickly as possible and not ‘put off’ until later in the Plan period. We consider it important to note that Waverley Borough Council and Waverley Housing Forum signed a Statement of Common Ground in which they both agreed that the Sedgefield approach should be used with regard to the 5YLS. We support GBC’s application of the 20% buffer to take account of the persistent under delivery of housing in the Borough.

45. Paragraph 4.188 of the TPHD reports that the housing target from the base date (2015) to adoption of the Plan (2019) is 654, and envisaged backlog at the point of adoption is therefore 1,319 homes. GBC acknowledges that the NPPG says that local planning authorities should aim to deal with any undersupply within the first 5 years of the Plan period where possible.

46. Applying the Sedgefield methodology from a base of 2019/20 means that the Council will need to address a backlog of 1,319 dwellings between 2019/20 and 2023/24. In terms of the 5-Year Housing Land Supply, accepting Annual Housing Targets of 450 dpa in the first two years and 500 dpa in the last three years would result in a need for 2400 dwellings (480 dpa). However, as we have already indicated above. We consider that these target figures are too low, and that GBC should be seeking to address its OAN and housing shortfall as soon as possible. A reduced OAN of 12,426 dwellings still results in a requirement of 654 dpa over a 19 year Plan period.

47. Both the NPPF and the NPPG emphasise the importance of LPA’s seeking to address both their annual housing requirement over the Plan period and their housing backlog in the first 5 years of a new Local Plan.

48. Paragraph 47 of the NPPF states Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to cooperate (Paragraph: 035 Reference ID: 3-035-20140306).

49. The NPPG says that “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to cooperate” (Paragraph: 035 Reference ID: 3-035-20140306).

50. It is important to point out that should GBC follow this approach, this would result in a total of 4,589 dwellings, to which a 20% buffer needs to be applied to reflect recent under-delivery (654 dpa x 5, together with the envisaged housing backlog of 1,319 dwellings at the point of adoption (paragraph 4.188 of the TPHD)). This gives an initial 5-year requirement of 5,507 dwellings, or 1,101 dpa. GBC’s Annual Housing Figure is only just over 40% of this figure. This demonstrates just how ineffective and unambitious the Proposed Submission Draft Plan (2017) is in terms of boosting Guildford’s 5YLS.

51. The Sedgefield methodology demonstrates that even a trajectory skewed towards the later part of the Plan, fails to provide GBC with sufficient housing supply to meet its requirements during the first five years of the plan. This calls into question the effectiveness of the Plan and that, in accordance with paragraph 49 of the NPPF, policy S2 could be considered out of date from the point at which the Plan is adopted. As such we believe the plan is unsound as it is not consistent with national policy and nor is it effective as there are serious doubts as to whether it is deliverable over the plan period.

**Duty to Co-operate**
52. We reiterate our earlier expressed concerns regarding Guildford Borough Council (GBC)’s co-operation with its fellow Housing Market Area members; Waverley Borough Council (WaBC) and Woking Borough Council (WoBC). The Woking Core Strategy sets a housing requirement of 225 dpa below the OAN of 517 dpa identified in the West Surrey SHMA (2015).

53. As a consequence, there is a significant amount of unmet housing needs within Woking and that consideration needs to be given how this unmet need is going to be addressed within the HMA. This issue was raised by the WoBC Core Strategy Examination Inspector.

54. WoBC adopted its Core Strategy in 2012. The Plan covers the period 2010 – 2027. The Council is still to produce a Site Allocations Development Plan Document (SADPD) which will identify and allocate sites for development to cover the period up to 2027, including provision for 292 dpa. WoBC acknowledged in its written submission to the Waverley Local Plan Examination that given its current OAN of 517 dpa that there is currently an unmet housing need arising from Woking, which still needs to be addressed.

55. Furthermore, the Council also made it clear in its written submission that a review of overall housing number will not take place until there is a future review of the Core Strategy, and that this will only occur after the SADPD has been produced and adopted. The SADPD is not intended to identify sites to meet unmet need within the Housing Market Area.

56. We understand that during the current Waverley Draft Local Plan Examination Hearings the Inspector indicated that he considered it appropriate for Waverley and Guildford to accommodate the unmet need from Woking.

57. Given the unmet needs of the HMA, together with significant affordability pressures, it is somewhat surprising that the Council has chosen to reduce its overall Local Plan housing requirement by 1,400 homes.

58. Whilst the TPHD does refer to the issue of unmet need in relation to the reduced housing requirement, this is in regard to the relative appropriateness of using specific allocations to address unmet needs from other authorities. In particular, GBC concentrates upon the potential adverse impacts in relation to some allocations. Further deliberation doesn’t appear to have been given to the benefits of meeting the wider housing needs of the HMA given the level of need and significant affordability issues identified in the West Surrey SHMA. The focus being on perceived environmental harm, rather than the economic and social consequences of the Plan failing to deliver sufficient new homes to meet current and future needs.

59. Despite there continuing to be a significant level of unmet need across the HMA, there does not appear to be any commitment from GBC with regard to helping to meet Woking’s unmet housing needs. Instead, it is seeking to reduce its own housing requirement. The consequences for GBC of failing to fulfil its legal obligations under the Duty to Co-operate are very serious. Local Plan Examination Inspectors elsewhere have advised local authorities to withdraw their Plans as a result of failing to work with other Authorities to address unmet needs. St Albans District Council is but one such example. In its case, a recent High Court challenge by the Council against its Local Plan Examination Inspector’s findings failed. The Court reiterated the importance of ongoing engagement to address strategic policy matters of a cross-boundary nature.

60. We are very concerned that despite this unmet need being known about for some considerable period of time now, there does not appear to be any mechanism in place to actually address this important matter. Accordingly, it does not appear that the Plan has been positively prepared as required by the NPPF.

61. It is particularly noteworthy, that unlike WaBC who has been advised that it will be required to accommodate a significant proportion of Woking’s unmet need, GBC is not seeking to address any of this unmet housing need. Given the fact that Woking has already accrued a very significant backlog of unmet housing need, it is a particular concern if tackling the HMA’s deficit is a matter that is not sufficiently addressed and left to be sorted out at some unknown point in the future.

62. We consider that in order to comply with the NPPF, GBC must be able to demonstrate that the Draft Local Plan has sought as far as possible, to assist in meeting the HMA’s unmet housing needs, in the same way as Waverley is doing. We do not consider that the available evidence demonstrates this, particularly given GBC’s decision to reduce its overall housing target figure for the Plan period.

63. It is fully apparent that co-operation between the 3 local authorities within the HMA has been ineffective with regard to ensuring that its overall housing needs are addressed and met.
64. We would reiterate that our client’s site at Farncombe was previously identified as a part of proposed housing allocation (number 80) in the 2014 iteration of the emerging Local Plan. Furthermore, WaBC did not object to this allocation. Indeed, it agreed to work with GBC on reviewing the Green Belt.

65. There is a clear need to reconsider the release of land from the Green Belt and AONB around larger villages where it is of lesser sensitivity in terms of landscape or environmental value. We submitted evidence at the time of the 2016 Local Plan consultation to demonstrate why our client’s site at Farncombe fully merits release.

**Housing Delivery**

66. In our previous representations we referred to the following table in the 2016 Housing Delivery Topic Paper (paragraph 4.169), which shows that housing completion rates over the last decade have been low. It also demonstrates a record of under delivery of new homes against the OAN, leading to a significant backlog accruing over a short period of time. We have updated this by adding 2 No. additional rows to incorporate the annual housing completions for 2015/16 and 2016/17 as recorded in the Council’s Topic Paper: Housing Delivery (June 2017).

**Housing Completions**

[See attachment for Table 5]

67. The Land Availability Assessment states (p.12) that the five-year housing land supply for 2016/17 (which covers the monitoring period 1st April 2017 to 31st March 2018) is only 2.36 years. More recently (July 2017), WYG has published an information sheet listing the current 5 Year Housing Supply position for LA’s in the South East and East regions as of June 2017 (see Appendix 3). Worryingly, Guildford’s 5YLS is shown as having deteriorated further and now being reduced to just 2.1 years of housing land supply. Furthermore, GBC is listed amongst the bottom 10 LA’s in terms of housing land. Therefore, sites capable of delivering housing in the short term and contributing to boosting the 5YLS (such as our site) need to be allocated. Otherwise, GBC’s dire 5YLS and affordability positions will continue to worsen. Policy S2 as currently drafted will only reinforce GBC’s record of persistent under-delivery. Furthermore, the Local Plan would be out of date at Adoption given that against the Council’s annual housing requirement and backlog it would be incapable of demonstrating the existence of a 5YLS.

[Text continues in next comment]

[See attachments for Appendices]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: Tables attached to rep.pdf (24 KB)  Appendices.pdf (3.2 MB)
Site allocations

68. In paragraph 3.8 of the TPHD it is stated that when developing new Local Plans, the Council must weigh up the constraints and test different options regarding how much development can be accommodated. For Guildford these include the Surrey Hills Area of Outstanding Natural Beauty, the Thames Basin Heaths Special Protection Area, Green Belt, flood risk and infrastructure capacity, such as the road network.

69. Paragraphs 3.13 and 3.14 of the TPHD state that the Land Availability Assessment (LAA) has been prepared using the methodology set out in the NPPG. Previous SHLAAs did not use a site size threshold but for this LAA, the recommended size threshold of five or more homes has been used. The LAA is important evidence but it does not itself determine whether a site should be allocated for development, nor does it grant planning permission. The LAA has not been updated for the Regulation 19 Local Plan (2017) however an addendum has been prepared which provides a factual update and information on the changes to the site allocations. GBC has used the LAA (2016) to inform housing supply from non-allocated sites.

70. As a consequence, approximately 1,400 homes have been lost from the Regulation 19 Local Plan (2016) through the removal of sites that are no longer considered suitable for allocation for a variety of planning reasons (e.g. site unavailability and alternative uses being proposed).

71. GBC states in paragraph 4.11 of the TPHD that its spatial strategy continues to seek to meet its OAN. The Regulation 19 Proposed Submission Local Plan (2016) identified a housing target of 693 which equates to 13,860 homes over the plan period (2013-33). However, the identified supply was approximately 15,844 which represented a 14% buffer over and above the housing requirement. The buffer ensured that it was able to meet objectively assessed needs with sufficient flexibility to adapt to rapid change, as required by paragraph 14 of the NPPF. It also provided a robust supply of housing sites to ensure that the housing requirement was met reflecting the uncertainties related to the delivery of certain key infrastructure that is considered necessary to ensure the planned growth is sustainable. In particular, a number of our strategic sites are dependent upon the delivery of Highways England’s A3 Guildford scheme. Due to the completion of the scheme only being expected by 2027, a proportion of the supply is assumed to be built after this date.

72. GBC refers in paragraph 4.12 of the TPHD to the fact that the Regulation 19 Local Plan (2017) has a reduced overall housing provision figure. It says that prior to the removal of sites, it first explored whether they could potentially be retained in order to meet unmet needs arising from elsewhere in the HMA. Having undertaken the exercise it continues to consider that these sites are not appropriate for allocation and should continue to be removed for good planning reasons, based on either new evidence or changing circumstances.

73. We consider GBC’s remarks in paragraph 4.13 of the TPHD to be very important. This states that whilst every effort has been made to maximise sustainable sites that are able to deliver in the first five years, there remains a significant shortfall when taking account of the deficit accrued since 2015 and the 20% buffer brought forward from later in the plan period. The Regulation 19 Local Plan (2017) therefore continues to propose a phased target which begins at a relatively low level in the early years (now even lower than previously proposed) and increases thereafter in line with the expected delivery of infrastructure and strategic sites. GBC goes on in the following paragraph to say that its own continued shortfall in the early years, therefore, reinforces the inability to meet unmet needs arising from within the HMA. We do not believe or accept that there are not sites available which could be brought forward in the short-term and help address any unmet need across the HMA. We comment below on our client’s site at Farncombe.

74. Paragraph 4.16 in the TPHD explains that the Regulation 19 Local Plan (2017) has a reduced overall housing supply of approximately 2,000 homes. Approximately 1,400 homes have been lost from the Regulation 19 Local Plan (2016) through the removal of sites that are no longer considered suitable for allocation for a variety of planning reasons, irrespective of OAN. The remaining 600 homes are as a result of a more realistic phasing assumption on two strategic sites.

75. Reference is made in paragraph 4.164 of the TPHD to the deletion of the proposed allocation of 1,100 dwellings at Normandy and Flexford. We very much welcome the fact that the Council has taken note of the objections of ourselves and others that were made to the 2016 Submission Draft Local Plan consultation. Consequently, we fully support the de-allocation from the Draft Submission Local Plan of 1,100 dwellings at Normandy and Flexford.
However, we consider that pushing housing delivery back to further on in the Plan period is contrary to NPPF requirement to boost housing delivery and demonstrates a lack of confidence of officers with regard to the deliverability of their sites.

77. We note that 2017 Draft Submission Plan makes provision for two increased housing allocations at New Street, Guildford (an extra 200 dwellings) and land south and east of Ash and Tongham (an extra 550 dwellings).

78. GBC states that it now considers that Guildford town centre will deliver 1,150 homes to 2034 (paragraph 4.57 of the TPHD).

79. There are acknowledged to be deliverability concerns on some sites, primarily related to sites where there is not a suitable relocation option available (paragraph 4.59). For example, Guildford library, and adult education centre (removed in the Regulation 19 Local Plan (2016)). The loss of these uses would not be acceptable without a suitable alternative available location. In addition to this and as set out above the Telephone Exchange has also been removed from the Regulation 19 Local Plan (2017) on the basis of availability and deliverability concerns.

80. The extra 200 dwellings at Site A6 in the urban area (North Street redevelopment, Guildford town centre) arises as a result of reduced comparison retail floorspace from 45,000 sq m to 41,000 sq m and increased food and drink element from 3,000 sq m to 6,000 sq m. The increased housing capacity from 200 studio/1-bed flats to 400 homes has resulted from a change in the retail provision to reflect the latest retail needs study and evidence of demand for comparison/food and drink retail uses. GBC states that the change in housing reflects the aspirations of the site promoters.

81. The site is identified in the 2016 LAA as Site 205. It is identified as currently being a mix of uses including bus station, retail and food and drink, surface car park, office, shops and some vacant properties. Over the last three decades there have been several outline planning permissions and reserved matters details approved for comprehensive mixed use redevelopment including retail, flats, restaurants and cafes (Class A3), community space (Class D1), car parking, replacement bus station, a public square. The most recent of these expired in 2015.

82. The North Street site is said to be the only opportunity within the proposed primary (core) shopping area on which to provide a significant amount of additional retail floorspace to meet future needs, to consolidate the role of the town centre. It has potential to greatly improve the appearance and function of the area. Due to the site’s town centre location and a number of historic industrial activities in the vicinity, investigation and potential remediation may be required prior to any redevelopment. Depending on the proposals for development of the site, the bus interchange facilities that are presently provided at Guildford bus station on the site may need to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site.

83. It is apparent that the North Street site has been promoted as a development opportunity for a considerable period of time. The deliverability of this site is therefore questioned, particularly if bus facility provision or relocation is required. Furthermore, it is noteworthy that increased housing provision on this site would, in the Council’s own judgement, be to the detriment of town centre retail provision.

84. The Guildford urban area (including Slyfield Area Regeneration Project, but excluding Guildford town centre) is said to be likely to generate 1,450 homes to 2034 (paragraph 4.62 of the TPHD). The Slyfield Area Regeneration Project itself (A24) is said to have a capacity of 1,500 homes with 1,000 homes expected to be delivered in the Plan period due to development being dependent upon the relocation of the Sewage Treatment Works (paragraph 4.67 of the TPHD).

85. The Plan allocates 1,750 homes (was 1,200 homes) on land to the south and east of Ash and Tongham (A29). The allocation has been increased to include the planning permissions in the area that have not yet commenced due to the current unavailability of Suitable Alternative Natural Greenspace (SANG). The Site also includes land for a new road and footbridge over Ash.

86. In relation to Ash and Tongham, paragraph 4.108 of the TPHD says that the number of homes proposed in this area roughly compares to the number of homes proposed at former Wisley airfield (2,000 homes), but without much of the supporting uses and infrastructure. The piecemeal nature of this site in terms of its fragmented ownership and how it is being delivered, in part ahead of the Local Plan without CIL, means housing is being provided without many of the additional benefits.
87. The Plan allocates approximately 2,000 dwellings (was almost 1200 dwellings) on sites in and around existing villages.

88. At least 3,200 units will be provided in 2 urban extensions, north east of Guildford at Gosden Hill Farm, and SW of Guildford at Blackwell Farm (was 4,000 dwellings); and Wisley new settlement to contain approximately 2,000 dwellings (was over 2,000 dwellings).

89. We consider that there are serious question marks regarding the reliability of envisaged housing delivery from a number of the sites referred to above. In particular, North Street, Guildford (A6) is a long standing re-development proposal whose re-development would require the provision of new bus facilities and be to the detriment of retail provision in Guildford town centre. Slyfield Area Regeneration Project (A24) requires the relocation of sewage treatment works which is likely to be both expensive and time-consuming. Whereas increased housing provision at Ash and Tongham (A29) involves complex land and multiple site ownerships which are likely to make it difficult to co-ordinate and deliver development on the ground in a timely manner.

90. GBC specifies that whilst only sites that are key to the delivery of its strategy are allocated, as required by the NPPF, the LAA identifies all sites that are suitable, available and achievable for housing and economic development uses over the Plan period (paragraph 4.35 of the TPHD). As a general principle, GBC considers that sites key to delivering its strategy are those that are in excess of approximately 25 homes or are delivering other specific use classes. Whilst they are not all formally allocated in the Proposed Submission Local Plan, all homes identified in the LAA (the LAA has a threshold of five homes or more) have been counted in terms of calculating GBC’s supply. In addition to this, GBC’s supply also includes assumptions on non site-specific sites, namely windfall and Rural Exception Sites, and information on outstanding permissions and completions.

91. We consider that there are question marks concerning the realistic delivery of a number of sites recorded in the LAA. We note that some sites in the LAA have been promoted for many years, some have multiple land ownerships, and some have never been actively promoted by landowners.

92. GBC acknowledges in paragraph 4.37 of the TPHD that the NPPF requires us to “boost significantly the supply of housing” (para 47), and “deal with undersupply within the first five years of the plan period where possible” (NPPG, Paragraph: 035 Reference ID: 3-035-20140306). It then goes on to state that it does not consider this is possible in Guildford.

93. We welcome GBC’s acknowledgement in paragraph 4.39 of the TPHD that it considers that in general terms there are exceptional circumstances that justify the amending of Green Belt boundaries in accordance with the NPPF, paragraph 83 and that its evidence base identifies a high level of need for market and affordable housing and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns.

94. Paragraph 83 of the NPPF specifies that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

95. Paragraph 182 of the NPPF states:

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
● Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

● Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities (our emphasis); and

● Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

96. Paragraph 4.179 of the TPHD refers to the fact that the revised OAN for the Plan period is 654 x 19 years = 12,426 homes (2015-2034). GBC states that it considers that it can meet the OAN with flexibility. It states that the total potential provision of new homes across the plan period (including completions since 2015 and outstanding capacity) is 13,581. This provides 1,155 homes as a buffer. This equates to a buffer of just under 10%. This is a reduction compared to the Regulation 19 Local Plan (2016) which included a buffer of approximately 14%. GBC says this reduction is justified and does not impact the robustness of its Plan as there is now less uncertainty in relation to its ability to meet the proposed housing requirement. This is said to be due to the more realistic assumptions now being made on the strategic sites of Blackwell Farm and Gosden Hill compared to the previous Plan which was based on more optimistic delivery assumptions. The Council specifies that this is not planned over provision – rather it is built in flexibility that seeks to limit the risk of housing policies in a newly adopted Local Plan being considered out of date. It refers to the fact that the NPPF says that, “Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.” (para 49).

97. We would emphasise that the LAA is different from an allocations document, and that the identification of sites within the Assessment cannot be any guaranteed that sites with ‘potential’ will actually be delivered on the ground. As we have already referred to above, we have serious doubts regarding some of the entries in the LAA, and do not consider that their identified housing delivery rates stand up to close scrutiny.

Proposed Allocation at Farncombe

98. Paragraph 4.167 of the TPHD refers to the fact that the Green Belt and Countryside Study (GBCS) identifies a Potential Development Area (PDA) at Farncombe, located on medium sensitivity Green Belt within the AONB. In relation to the AONB, it goes on to say that the NPPF states, at paragraph 116, that planning permission should be refused for major developments except in exceptional circumstances and where it can be demonstrated they are in the public interest. The development of the site for circa 90 dwellings is classed as major development. GBC do not consider that the benefits with providing these homes pass the considerations listed within the NPPF bullet points and which form part of the public interest assessment. We strongly disagree and believe that the Council is failing to give sufficient weight to meeting its dire need for additional housing its new Local Plan. It is also failing to identify defensible Green Belt boundaries that reflect its long-term development needs.

99. In terms of Local Plan preparation, the Guildford Borough Draft Local Plan: Strategy and Sites document (2014) set out the Council’s preferred options for growth. Our client’s site at land South of New Pond Road, Farncombe was previously identified as part of a residential allocation (number 80) within the Draft Local Plan. It was also proposed that the land be removed from the Green Belt and the Green Belt boundary re-aligned. We consider this to have been a good example of the Duty to Co-operate being put into action. Sadly, in more recent times, there appears to have been a failure to ensure that the HMA’s unmet needs are adequately addressed.

100. The 2014 Draft Plan contained the following reference:

“4.113 In accordance with national policy, Green Belt boundaries need to follow defensible lines that are easily recognisable and likely to be permanent. This includes for instance roads, railway lines, woodlands and hedgerows. We have reviewed and followed the recommendations of the GBCS with the following amendments…:

Farncombe: we have identified a development site that adjoins the settlement of Farncombe and land reserved for future development in Waverley Borough Council’s Local Plan 2002. We will continue to work together to progress this land over the plan period”.

Page 2659 of 2988
101. Countryside Properties confirms that the land south of New Pond Road can be delivered within the first five years of the adoption of the Guildford Borough Local Plan and contribute circa 90 dwellings to the Borough’s 5 year housing land supply with an estimated average construction rate of about 30 dwellings per annum.

Tests of Soundess

102. In view of the above considerations, we consider that the Local Plan is not sound, because it is not ‘consistent with national policy, as it fails to ensure that a 5 year housing land supply is provided from the start of the Plan, it also fails to identify how the wider needs of the Housing Market Area (HMA) will be addressed, and finally its OAN fails to make provision for all relevant housing needs. It is not compliant with the duty to co-operate. It will also not be ‘justified’, or ‘effective’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives, and there is doubt over its deliverability.

Summary and Conclusions

103. Any reduction in the requirement based solely on economic circumstances would appear to be ignoring wider trends and market signals. We therefore consider the Council’s decision to reduce the housing requirement is not justified and as such makes the policy unsound.

104. As a consequence of the necessity to bring about a step change in housing delivery rates and meet its obligations under the Duty to Co-operate, the Council will need to ensure that it makes provision for necessary Green Belt revisions and the allocation of sites, such as the land South of New Pond Road, Farncombe, which can deliver circa 90 dwellings, and was identified as one of the Council’s preferred allocations in the Draft Local Plan (Regulation 18) in 2014. Given the acknowledged fact that housing delivery will be weak in the early years of the Plan period, it will be important to bring forward smaller and medium sized sites such as the land South of New Pond Road, Farncombe.

105. In conclusion, we would highlight the following matters

- There does not appear to the any justification for the Council seeking to reduce the length of the Plan period;
- Increased affordability issues, together with low housing delivery rates in Guildford, points to the need for rapid action to boost the housing by bringing forward sites lacking in constraints;
- There remains an urgent need to address unmet need within the HMA, in particular with regard to Woking;
- Annual Housing Targets seem entirely focused on ensuring that GBC maintains a 5YLS, rather than addressing the OAN. Indeed, they fail to even deliver the reduced level of OAN being proposed;
- As a consequence, there is over-reliance on development at the back end of the Plan period. This is dangerous because it does not allow sufficient time for other sites to be brought forward should delivery not occur as envisaged; and
- No uplift to the OAN has been made to take account of the very high affordable housing requirement that has been identified

Proposed Amendments

106. The following amendments are proposed:

1) The Plan should not rely from its outset upon low and unambitious Annual Housing Target figures. Instead, it should identify a deliverable 5 year housing land supply, to which our client’s site South of New Pond Road, Farncombe can make a contribution.

2) The Plan needs to specify how the wider unmet needs of the Housing Market Area are being addressed; and

3) The OAN needs to be increased to reflect in-migration from London, market signals and the affordable housing demand.

[See previous comment's attachments for appendices]
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/419  Respondent: 17399681 / Anthony Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan contains a disproportionate imbalance across the Borough. The Borough is over 100 square miles in area. The Plan designates land for the development of 11350 homes. Of these, 4613 (40.6%) are within 3 miles of Send Marsh. This is a wholly disproportionate and unreasonable concentration of development, most of it on Green Belt, in that part of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3180  Respondent: 17399681 / Anthony Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is wrong in principle to remove Brownfield sites (A4 and A34) from the Plan. To comply with national guidelines, such sites should be developed first before consideration is given to greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3179  Respondent: 17399681 / Anthony Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

It is wrong in principle to remove Brownfield sites (A4 and A34) from the Plan. To comply with national guidelines, such sites should be developed first before consideration is given to greenfield sites.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

Comment ID: pslp172/3181  Respondent: 17399681 / Anthony Smith  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

There is virtually no infrastructure planning for sites A42, A43 and A44, which between them will have a serious impact on all local infrastructure.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:

Comment ID: pslp172/3177  Respondent: 17399681 / Anthony Smith  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()

Section 4.2.24 of the Plan states that ‘Gypsy, Traveller and Travelling Showpeople accommodation is required within development sites of 500 homes or more to help create sustainable, mixed communities with suitable accommodation for all’. Therefore there should be no Travelling Showpeople plots at A43 (Garlicks Arch), which is designated for 400 homes. In this connection the failure to amend Policy A44 (Land west of Send Hill) to remove travellers’ pitches is astounding, since this Policy provides for 2 travelling people's’ pitches at a site designated for only 40 homes.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  
Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp172/3183</th>
<th>Respondent: 17399681 / Anthony Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A44</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>There is virtually no infrastructure planning for sites A42, A43 and A44, which between them will have a serious impact on all local infrastructure.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3178</th>
<th>Respondent: 17399681 / Anthony Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The inclusion of Policy A58 (Burnt Common) is wholly inappropriate. The site provides an essential green buffer between Send and the A3, and the provision of so much industrial space there will result in an unacceptable strain on local infrastructure, particularly local roads.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1474</th>
<th>Respondent: 17399681 / Anthony Smith</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
There is virtually no infrastructure planning for sites A42, A43 and A44, which between them will have a serious impact on all local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3234  Respondent: 17399809 / Persimmon Homes Thames Valley (Nicola Hume)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Proposed Change</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1,750 homes including some self-build and custom house building plots</td>
<td>We are supportive of the inclusion of land that currently has planning permission in the area. However, we are unclear how this land will contribute towards the requirements that are now included within this policy. With regards to the self-build and custom house building plots, there is no evidence supporting the inclusion of this requirement. The Council are still at an early stage of assessing the local demand for such plots of land. There is no evidence that there is a demand for such plots in Ash and therefore we do not agree with this modification and it should be removed. The figure of 1,750 homes should not be treated as a cap and the wording amended to allow more flexibility to increase the numbers if it is found the land has greater capacity. All potential development parcels should be maximised to allow the delivery of much needed housing within Guildford Borough. The Council have reduced the housing figure by 1,400 homes over the plan period. It would appear that the Council are not meeting the Duty to Cooperate (DTC) in reducing the housing figures; other authorities within the Housing Market Area (HMA) are struggling to meet their need; such as Woking. The Inspector for the Waverley Local Plan indicated that Waverley and Guildford should be looking to meet the unmet need of Woking. This does not appear to have been addressed by Guildford.</td>
</tr>
</tbody>
</table>

(1) Appropriate financial contribution to enable expansion of Ash Manor Secondary School by additional 1FE | We would want to ensure that this contribution would not conflict with any future CIL payments that the Council may be looking to progress. We would also want to ensure that the level of payment requested is of an appropriate level for the development. As mentioned above the policy includes land which already benefits from planning permission, with an agreed sIOG. The land which does not yet benefit from a planning permission should not be expected to make up this shortfall, if any, in contributions. |
(2) Appropriate financial contribution towards expansion of existing GP provision in the area or land and a new building for a new GPs surgery

As above.

(3) Sufficient capacity is available within Ash Vale wastewater treatment works to accept wastewater from this development within its permitted limits

Persimmon has no comment on this. The capacity of foul water networks would be assessed as part of a planning application.

(9) Land and provision of a new road bridge which will form part of the a323 Guildford Road, with an associated footbridge, to enable the closure of the level crossing on the a323 Guildford Road, adjacent to Ash railway station

Whilst we agree that the council should include the bridge within this policy; which means that the location of the road bridge can be safeguarded to allow it to be accommodated in a more suitable and achievable location; than policy a30 was previously suggesting. Whilst persimmon do accept that in the long term a bridge will be required, alongside the closure of the level crossing. However, Council have continued to fail to demonstrate that the bridge is required in the short term and that the delivery of the 1,750 homes, within policy ’29, requires the bridge. We note that a parcel of land that was included within Policy A30 for the delivery of the road bridge has not been included within Policy A29, to the north of the railway line. Therefore the originally envisaged road bridge alignment, as proposed by Mayer Brown, can no longer be achieved. The Council have not provided a preferred route for the road bridge. In the meantime applications for residential development continue to come forward, potentially impacting on the most appropriate location of the road bridge. The Council need to provide a clear strategy of where the preferred and, more importantly, the most suitable alignment of the road bridge should be located, with the appropriate evidence base. Within the Guildford Borough Transport Strategy 2017, there is an estimated cost of £15 million for the new road bridge and footbridge scheme. However, it is not clear what the cost includes and what alignment this takes into account. As part of the land included within Policy A29 already benefits from planning permission it is unclear how these elements will contribute towards the road bridge, if it is indeed found that the bridge is required to mitigate the effects of the housing in Policy A29. As set out in the previous representations, 15th July 2016, the funding mechanisms, outside of developer contributions, are unclear. The evidence and changes to the Local Plan do not clarify this position. Therefore it is still unclear why the Council are stating that the road bridge is ‘anticipated’ rather than an aspirational element of the policy. We note that the wording of this element of the policy calls for land and provision of the new bridges. How this will work in practice
is still unclear. If land is being provided by a party for either of the bridges then the level of monetary contribution needs to be considered against this. As set out in Persimmon Homes' representations dated 15th July 2016, an area of land will be safeguarded for delivery of a footbridge within land controlled by Persimmon, with the remaining land coming forward for residential development. This would then allow the road bridge to be delivered within the wider policy area, meaning that an appropriate location can be secured and allow the Design Manual for Roads and Bridges standards to be met; which the previous alignment did not allow for.

<table>
<thead>
<tr>
<th>Key considerations</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(4) Height and layout of road bridge and footbridge</td>
<td>(4) The Council need to provide guidance on the location and mechanism for delivery, as detailed above and ultimately if the bridge is required due to the impact of delivery of policy A29.</td>
</tr>
<tr>
<td>(11) Potential noise and air quality issues</td>
<td>(11) This will be consider when bringing forward an application</td>
</tr>
<tr>
<td>(12) Proximity to ancient woodland/SNCY</td>
<td>(12) No comment</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1475  Respondent: 17399809 / Persimmon Homes Thames Valley (Nicola Hume)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The affordable housing policy now states that the Council 'will seek' at least 40% of the homes as affordable homes on developments providing five homes or more. The Council are correct to wish to meet their affordable housing requirements however there are occasions when the viability of site delivery can be affected by the requirement for a high provision of affordable homes especially on relatively small schemes. The Council are therefore correct to keep the option for affordable provision relatively open to discussion and, whilst seeking the requirement, there must be an acknowledgement that at times a lower provision may be required. The affordable housing requirement should therefore be discretionary and some element of flexibility allowed for within this policy based on circumstances. The delivery of housing has to be the main target and to compromise the viability of schemes will severely hamper this delivery.
Persimmon Homes are supportive of the inclusion of point 4 within Policy H2 which allows for off-site payments and payments in lieu to be made. This allows for flexibility for the provision of affordable homes and does not restrict the delivery to sites where this may not be practical or could impact on the viability, and therefore delivery, of the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1476  Respondent: 17399809 / Persimmon Homes Thames Valley (Nicola Hume)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Guildford Local Plan is unsound as the identified housing delivery strategy is ineffective Persimmon Homes believe that the proposed housing trajectory and the process of delivery is flawed and will result in significant under-delivery of expected units. The removal of the Housing Trajectory within Policy 52 is concerning and this now places a greater emphasis on the delivery towards the end of the plan period.

This approach places a significant risk that the Plan may fail to meet its housing requirement particularly when there is an over-reliance on large sites being delivered for this period. This will leave the Council in a difficult position as there will be little time afforded to make up any shortfalls in delivery. This approach appears to be a way of the Council delaying development until as late in the plan period as possible and there can be no element of positive planning about this. The Council must consider smaller sites which are capable of delivering a sufficient quantum of development to run alongside the larger strategic sites. The Housing White Paper (HWP) has referred to the importance of including smaller sites to ensure a consistent supply is maintained. The issue of deliverability is exacerbated by the Council's inability to demonstrate a five year housing land supply.

The Council are unable to show this for the first 5 years of the plan period when it is in operation. There are severe concerns over the delivery of some of the larger sites upon which the Council are relying. The Plan proposes that smaller sites will deliver in the first five years with the larger strategic sites delivering in the 6-10 and 11-15 year periods. This back loading of the majority of development is concerning particularly when there are deliverability issues with some of the strategic sites such as Wisley Airfield. A planning application was refused for this site and an appeal to be heard later in the year. Neighbouring authorities Mole Valley and Elmbridge objected to this proposal and Highways England have previously raised concerns over the impact that this development will have on the A3 and M25 at junction 10. Paragraph 47 of the NPPF states that there is a requirement for Local Planning Authorities (LPA) to "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements".

It has been established that GBC cannot demonstrate a robust five year supply of deliverable housing land and at best the Council can show 2.1 years supply. Guildford therefore need to make more land available for development as without this Guildford cannot expect to be able to show a five year supply. Guildford have removed sites from this draft of the Local Plan which are in the Green Belt and considered to be sensitive. Guildford should be looking to allocate smaller sites, which are able to contribute to providing for housing delivery in order to ensure a rolling five year land supply. The NPPF at paragraph 83 states that "Green belt boundaries should only be altered in exceptional circumstances" however we would advise that the inability to show a five year land supply should be considered to be exceptional circumstances. In terms of an approach to assessing the five year supply it appears that the Council are favouring the Liverpool method which will see the backlog delivered over the life of the plan period.
This does not accord with national policy which suggests that the Sedgefield method should be used which aims to deliver the backlog as quickly as possible and ensures that development is not delayed. In addition to this the Council propose to use 20% buffer which we would agree with given the past delivery problems. We believe that the Local Plan is unsound as the current proposed housing trajectory is ineffective and will not provide the full housing requirement over the plan period.

It is extremely disappointing that the Council have reduced their housing requirement from the 2016 iteration of the Plan to the 2017 version. Guildford's Objectively Assessed Need (OAN) has previously been identified as 693 dwellings per annum (dpa) upon which the 2016 housing requirement was set, with Guildford seeking to meet its housing needs in full. This was an extremely positive step in an area where housing needs have increased significantly and where pressure for new housing is extreme.

The 2017 version has lost some 1400 dwellings from the 2016 iteration, which equates to a reduction of 75 dpa over the plan period. This is a significant reduction and one which is not justified. The most up-to-date population projections produced by the Office for National Statistics (ONS) shows that by 2037, the population of Surrey is expected to increase by over 200,000 people. It can be expected that a large proportion of this increase will be in the West Surrey HMA due to its proximity and access to London and reputation as being part of the commuter belt and a desirable place to live. The OAN as calculated in the new draft Local Plan is therefore inaccurate and should be revised upwards. The 2017 addendum to the SHMA indicates that due to changing circumstances the Borough's housing need should be reduced from 693 dpa to 654 dpa. The argument for this appears to be based on economic and migration factors.

The SHMA addendum uses the 2014 household projections as the most up-to-date figures available at the time of the compiling of the evidence. These projections show a percentage increase of 1.2% from the 2012 projections used previously. The migration argument is based on both internal and international migration. The SHMA identifies that there is likely be a reduction in EU migration following the vote for the UK to leave the EU. However, as the SHMA states in paragraph 3.73 Guildford 'sees a lower proportion of EU in-migrants than was the case at a regional/ national level'.

Therefore, any reduction in EU migration is likely to have little impact on Guildford. Even if EU migration is reduced, any future trading relationships established with other countries is likely to see a requirement to allow movement of people. This therefore means that there is a likely expected increase in international migration and the impacts of this do not appear to have been sufficiently assessed. Internal migration focuses primarily on out-migration from London. At the most recent assessment, London has a substantive unmet housing need and a number of Local Authorities in London are developing Local Plans which do not appear to make concerted efforts to deal with this unmet need.

The SHMA addendum identifies that migration flows from London to Guildford have been steady since 2008/9 and there has been no increase in net flows since the end of the recessionary period which is noted as being 2012. We are concerned that paragraph 3.45 seems to dismiss any potential increase in migration from London. Whilst there still remains some uncertainty regarding migration flows over the next 10 years evidence from the GLA shows that migration patterns will move towards the levels since pre-2008.

The recovery in the economy and the availability of credit has seen an increase in home ownership and mortgage applications since 2012. Therefore it can be widely assumed that an increasing number of people are seeking to purchase homes where possible. London's affordability has decreased substantially and this will have an impact on those areas around Greater London which have access into the capital for work and leisure purposes. Guildford, with a mainline train station and proximity to the A3 and M25 is historically an area where many people re-locate to from the Greater London area. In all likelihood, it is difficult to see how over the next 10 years there will not be an increase in migration from London to areas such as Guildford.

That no provision appears to be made for this and paragraph 3.46 argues that there are no signals for a return to increasing levels of migration should be given limited weight as this is based on a single year of evidence. There is an increasing need for housing in the Borough and this is coupled with an increasing requirement for affordable housing. The 2017 addendum shows that the need for affordable housing has increased to 517 dpa from the 2015 SHMA figure of 478 dpa and this is supported by paragraph 5.32 which states that 'it is clear that house price growth has accelerated in the Borough since mid-2013'. This affordability issue has been substantially affected by the low levels of housing growth in Guildford. In seven of the past eight years, Guildford has significantly under-delivered against its housing requirements.
For the past seven years in a row the Council have delivered barely half of its annual housing requirement and this significant underperformance has enhanced levels of unaffordability in the Borough and is a strong justification as to why the Council should not be looking to further reduce its housing requirement. Paragraph 5.49 states that 'the analysis indicates that 629 dpa would be required to support the rebased SNPP ...... to support economic growth, a marginally higher level of housing provision at 631 dpa would be required'. The 2017 addendum shows an increase in household projections, an increasing need for affordable homes and no consideration of the impacts of likely increased migration from London, suggests that insufficient uplifts have been included to account for these increases.

The decreasing affordability is exacerbated by the Council's persistent under-delivery against its housing requirement and therefore there is no justification as to why the requirement should be reduced in this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

Comment ID: pslp172/3184  Respondent: 17399873 / Christine Costa  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42: Clockbarn Nursery, Tannery Lane.

I object to Policy 42. Tannery Lane is a Lane in the heart of Send which is a village. Building 60 homes in place of 45 is an increase of 33% which the lanes cannot support. Send has already seen the closure of its post office and there is only one local shop that can provide grocery essentials. Not everyone has a car and the local bus service is abysmal; where will residents shop?

Tannery lane is a narrow lane and meets Send Road (A247). It is already a difficult access and further housing and an increase in traffic will only make this junction more difficult to navigate and cause increased noise for residents.

Surface water flooding is an existing issue in this area and this will worsen.

Finances should be committed to improving the problems in the village, not making them worse.

Hundreds of objections have been made to this proposal and the Council should not be ignoring its residents and voters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3186  Respondent: 17399873 / Christine Costa  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58: Land at Burntcommon, London Road

I object to this Policy. Where does it make business sense to build industrial space on Green Belt Land when there are empty sites and industrial units in Slyfield Trading Estate in Guildford?

As detailed above local roads cannot support the increase in traffic and certainly cannot support heavy transport lorries. The local first school is in Send Barnes Lane and building on this land will be a safety risk to the pupils there. The Council does not have the right to ignore current residents and railroad decisions without understanding the local needs and limitations of infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1478  Respondent: 17400065 / Diane Kett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I want to strongly express my objection for the proposed building on Gosden Farm. I don't think that Burpham as it is at present can possibly take the extra traffic that will come as a result of the new estate, park and ride, station etc. It will put another 3,000 to 4,000 cars on roads that already struggle especially during rush hours, when George Abbot school starts and finishes, when Aldi is busy or if there is a problem on the A3.

I agree that there is a need for housing but Burpham cannot possibly take this large number of new houses. I do think members of the council should visit the road through Burpham and the slip road off the A3 at peak hours to see how bad it is already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3201  Respondent: 17400641 / Stuart Adair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 Clockbarn Nursery, Tannery Lane. I object because: this is further increase 15 homes on 45 the was previously objected to; It degrade access and increase traffic notably in Tannery Lane and at the junction to A247; This is already a busy road in the mornings and evenings and it's is a bottleneck when A3 has traffic issues, which is frequent; It eroding the Green Belt of village well beyond that which is acceptable; There is inadequate allowance for surface water flooding prevention and river flash floods; It degrades the aesthetics of yhe area which is major reason for choosing to live here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3202  Respondent: 17400641 / Stuart Adair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 Land at Garlick's Arch, Send Marsh. I object to this because: it does not consider the previous objection reasons; there is no evidence of demand travelling people plots in this location; this is Green Belt land hence land use should not be changed; this is a significant number of houses that have a major impact on nature of area to wildlife, life in the village, the balance of the population geographically, traffic, and views in a very negative way; this development in an area with flood zone 2 and the total inadequate planning concerning flooding any devolpment would cause problems here and up and down stream if here as planning does hot consider the whole basin nor the all contributing factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3203  Respondent: 17400641 / Stuart Adair  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A58 Land at Burnt Common, London Road. I object because: it has not taken into account previous objections; the word "maximum" in 2016 plan has been changed to "minimum"; during this time the demand for industrial land and units has declined supported in 2017 Employment Land Needs assessment of 3.9 hectares not the huge allocation of 10 hectares in send; the related traffic will place a huge burden on local roads surface quality and significantly higher traffic volumes with larger queues and poor air quality; joins up existing villages quashing the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1497</th>
<th>Respondent:</th>
<th>17400641 / Stuart Adair</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td><strong>is Legally Compliant?</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy 2 Green Belt, paragraph 4.3.15. I object because: it is taking Sends businees park out of Green Belt policy; further expansion/development at this location detracts from the openness and appropriateness of green belt and it's protection; it will impact vehicle movement significantly using Tannery Lane; as a non-conforming user within The Green Belt it's expansion should be prevented.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3204</th>
<th>Respondent:</th>
<th>17400705 / Rachel Campbell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( )</td>
<td><strong>is Sound?</strong></td>
<td>( )</td>
<td><strong>is Legally Compliant?</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
<td>()</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am writing to object to the plans Policy A25: Gosden Hill Farm, Merrow Lane, Guidlford.

Under the proposed changes, the Infrastructure (1) has changed from a ‘new’ junction to an ‘improved’ junction. ‘Improved’ is incredibly subjective and will be difficult to prove. Traffic is already jammed at rush hours - Burpham is notorious for ‘crawling’ traffic after 4.30pm. The addition of traffic from 1,700 homes without a specific, designated junction and only the requisite that the current junction is ‘improved’ is simply not enough to ease the flow. These are small residential roads, not designed to withstand the heavy flow of traffic coming in from the A3.
Glendale Drive and Winterhill Way will become a cut through road for many people if a separate off-slip for the new Gosden Hill estate is not built. The roads simply cannot take any more traffic and it is quite frankly dangerous with people speeding through and lots of children walking to and from the schools through this area.

Our neighbours and ourselves have already complained several times to the Council regarding the quality of the road and how potholes are appearing, large cracks which now shake the surrounding houses. The Council simply states it does not have the money to fix the roads. Adding 1,700 homes worth of traffic on top of the problem is not the solution. As I pointed out to a local Councillor, the Council may not have the money to fix the roads but nor do we, as home owners, have the money to fix our houses from the shaking-damage and supplement the Council’s negligence in maintaining the roads. A group of neighbours are seriously considering legal action against the Council for their continued refusal to solve the problem.

I would also like to point out that the A3100 is not a ‘corridor’ within Burpham. It’s a residential road, already under immense strain at peak hours. We are also aware that the southbound Burpham slip road is already over its weight allowance to support the number of cars using it during peak hours.

I would also like to raise an objection to the significant bus network to serve the site. I’ve already mentioned the road quality within Burpham, specifically Glendale Drive (Winterhill Way was recently resurfaced). I would like to challenge the interaction with the Arriva bus network 36 & 37, which speed down Glendale Drive, contributing to the cracks and shaking of the houses and are hardly utilized. I would like to know what impact the new bus network will have on the existing one? Would we need both? Would the new bus network need to also drive through Glendale Drive?

I find statement (11) contradictory of the ‘allocation’ where a secondary school is mentioned and yet (11) says it will be determined at the time;

Surely this can already be determined? Places at the local secondary schools are already at a premium and with the addition of 1,700 homes it is clear a lot of children will miss out – including those of us already living here. Another secondary school needs to be built to service these homes so as not to impact the education of the younger children already here whose parents have moved to the catchment area in good faith.

I’d also like to query statement (22) where an Employment centre HQ is being proposed. I am unclear how this fits in with Guildford’s mandate of building new homes? This is a job centre? Not residential homes. I feel like this is a ‘sweetner’ to the Council to allow the planning to go through, providing them with an Employment Centre HQ, but it doesn’t fit at all with the surrounding area which is residential. How does an office in the middle of a residential area work?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Objection_letter_regarding_A25_Gosden_Hill1.docx (64 KB)
I have looked carefully at the new draft Local Plan and I wish to OBJECT for the following reasons.

East Horsley is a small village which does not have the infrastructure of roads, rail, parking, medical facilities or schooling to support such a huge increase in population. Fifty seven percent of new housing proposed is on land that is currently categorised as Green Belt. This is flouting government law which established Green Belt to protect the countryside for future generations.

It is proposed that East Horsley is to be “inset” from the Green Belt. This proposed change in settlement boundaries means that the East Horsley settlement area will increase by 37%. At the moment, one hundred houses are proposed near East Horsley station and over two thousand on the former Wisley Airfield, only about one mile from the East Horsley parish boundary. The site at Wisley has recently been increased to now include two more farms!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1492</th>
<th>Respondent:</th>
<th>17400801 / Hannah Punshon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

While the ONS forecasts population for growth for Guildford at 10.4% over the Local plan period, GBC proposes to increase the housing stock by 22%. Since Brexit, forecasts of increasing population numbers have been reduced, yet GBC are continuing to predict massive increases in population, which quite frankly, does not make sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3233</th>
<th>Respondent:</th>
<th>17402209 / Elliot Green</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes relating to policy A43 Garlick’s Arch because:

- Again you have ignored the thousands of previous objections.
- There are no “exceptional circumstances” required to develop on this Green belt.
- It will generate excessive traffic along the Clandon Road with associated noise and light pollution. This will be made even
worse if the adjoining Policy A58 is implemented.
- It would appear that there is no demand for Travelling Showpeople plots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3232  Respondent: 17402209 / Elliot Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Clandon Road, Burnt Common i find it incredible that GBC have failed to listen to the residents of Send and Burnt Common who previously in force have objected to the proposed Local Plan. Instead you seem to have made further changes that result in more development rather than less, failing in the duty of GBC to listen to residents.

It seems that you are simply ‘testing’ the patience of residents by repeatedly making further changes without realising that your proposals are completely unacceptable. It is unjust that you are focussing a disproportionate level of development in and around the Burnt Common and Send compared with our areas of the Borough.

I object to changes relating to Policy A58 Burnt Common because

- This Policy was deleted from the 2014 Plan following previous objections.
- Additionally i see the Plan now references ‘Minimum’ rather than the original ‘Maximum’ referring to the 7,000 sq feet of industrial or warehousing. If the original proposal was deleted again i see no reason why the changed plan actually increases the proposed level of development.
- The impact on the Clandon Road and adjoining roads will create huge traffic issues, and noise and light pollution issues.
- There is no need to develop on this section of Green Belt land when other local sites including Slyfield and Guildford have empty existing sites and ‘brown field’ sites amiable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3242  Respondent: 17402529 / Emma Buswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A42 change at Clockharn in Tannery Lane where there has been an increase from 45 homes to 60. This change takes no account of hundreds of previous objections made by local residents. The increase in numbers of homes will have a seriously detrimental effect on the traffic in the area, particularly as Tannery Lane is a small country road and should remain as such. This development is a significant erosion of the Green Belt in our area and is totally out of keeping with the rural nature and views across the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3243  Respondent: 17402529 / Emma Buswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43 change at Garlick’s Arch for the following reasons:

Again this change totally disregards the thousands of previous objections. It is a beautiful area of Green Belt with very valuable and beautiful ancient woodland – something which is totally irreplaceable. It is a massive development for a village of this size causing Ripley and Send to join up, something which Green Belt land is designed to prevent. Again – another development in this area will massively increase the congestion on surrounding roads, something which is already a particular problem in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3244  Respondent: 17402529 / Emma Buswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 at Burnt Common, London Road - which was deleted from the 2014 draft plan because of objections made previously. It is totally unnecessary and inappropriate to build industrial units on Green Belt land in a village of this size. There are already suitable and available sites within Slyfield and Guildford. Again any increased movements of industrial vehicles on the surrounding roads will lead to total gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1529  Respondent: 17402529 / Emma Buswell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt Policy 2, at paragraph 4.3.15; I object to the proposal to inset Send Business Park from the Green Belt for the following reasons:

It is a non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

Tannery Lane, as previously mentioned, is a small country lane which should remain as such and is totally unsuited to increased traffic volume.

Any additional expansion or development in this position will have a significantly detrimental effect on the Green Belt land in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/4924  Respondent: 17402625 / R Bhalla  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/4011  Respondent: 17402625 / R Bhalla  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I thoroughly support the removal of site A46 and site A47. I believe this development is inappropriate: green belt area should mean green belt. Any encroachment will only have an adverse effect entailing such factors as flooding, sewage and particularly the extra traffic which the roads were never designed for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4012  Respondent: 17402625 / R Bhalla  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I thoroughly support the removal of site A46 and site A47. I believe this development is inappropriate: green belt area should mean green belt. Any encroachment will only have an adverse effect entailing such factors as flooding, sewage and particularly the extra traffic which the roads were never designed for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2096  Respondent: 17402625 / R Bhalla  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
</tr>
<tr>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
I also object to the removal from the Green Belt of homes in Guildford Road, Flexford, Palm House Nurseries site, Walden Cottages and Glaziers Lane. The likely high density development will only deteriorate the “openness of Green Belt” and mostly will be used by ‘London Commuters’ thus just becoming a ‘London conurbation’ and not meaningfully benefiting the local area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1554</th>
<th>Respondent: 17404801 / Steve Punshon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

While the ONS forecasts population for growth for Guildford at 10.4% over the Local plan period, GBC proposes to increase the housing stock by 22%. Since Brexit, forecasts of increasing population numbers have been reduced, yet GBC are continuing to predict massive increases in population, which quite frankly, does not make sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1552</th>
<th>Respondent: 17404801 / Steve Punshon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

East Horsley is a small village which does not have the infrastructure of roads, rail, parking, medical facilities or schooling to support such a huge increase in population. Fifty seven percent of new housing proposed is on land that is currently categorised as Green Belt. This is flouting government law which established Green Belt to protect the countryside for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1553</th>
<th>Respondent: 17404801 / Steve Punshon</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is proposed that East Horsley is to be “inset” from the Green Belt. This proposed change in settlement boundaries means that the East Horsley settlement area will increase by 37%. At the moment, one hundred houses are proposed near East Horsley station and over two thousand on the former Wisley Airfield, only about one mile from the East Horsley parish boundary. The site at Wisley has recently been increased to now include two more farms!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3275  Respondent: 17405217 / M Greene  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy E4 Research Park expansion and we object to policy A26 Blackwell Farm.

The Council are proposing development on AONB, AGLV and Greenbelt land where there is no special circumstances and where such development will add to congestion and air quality issues which are already of serious concern to Residents and Businesses.

The Council objected to Waverley Plans for development at Dunsfold siting the impact of extra traffic, congestion etc to the A3 and also the Council object to development of a School and Housing at Fairlands (Rokers) in Worplesdon as inappropriate development which failed to mitigate its impact on infrastructure and the impact on the habitat of flora and fauna and the Council planning officers referred to the fact that the site was in the Greenbelt where there is a general presumption against inappropriate development. The Council Officers further stated that large scale residential development and a new school are inappropriate development which could only be approved in very special circumstances where the benefits outweigh the harm the development would cause. The Council Officers stated a school and housing do not amount to the very special circumstances necessary to justify grant of a planning application. However the Council include in their draft plan building on Blackwell Farm an area of outstanding natural beauty, Area of great landscape value and all in the Green Belt a school or schools and housing. No special circumstances are associated with this proposed development. Any attempt to argue economic necessity for expansion of the Research Park is negated as there is sufficient land and surface car parking at the existing Research Park and Manor Farm to allow expansion for the next 25 years without allocating more greenbelt land. The Research Park is a name only as many businesses on the existing park are just that businesses and with no great attachment to the University or research.

We therefore find it hypocritical of the Council to include Blackwell Farm in the revised Draft Local Plan. The extra traffic, congestion, delays and further damage to the air quality development at Blackwell Farm which would directly impinge on the two most congested junctions in Guildford at Egerton Road / A3 and A31 /A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to policy E4 Research Park expansion and we object to policy A26 Blackwell Farm.

The Council are proposing development on AONB, AGLV and Greenbelt land where there is no special circumstances and where such development will add to congestion and air quality issues which are already of serious concern to Residents and Businesses.

The Council objected to Waverley Plans for development at Dunsfold siting the impact of extra traffic, congestion etc to the A3 and also the Council object to development of a School and Housing at Fairlands (Rokers) in Worplesdon as inappropriate development which failed to mitigate its impact on infrastructure and the impact on the habitat of flora and fauna and the Council planning officers referred to the fact that the site was in the Greenbelt where there is a general presumption against inappropriate development. The Council Officers further stated that large scale residential development and a new school are inappropriate development which could only be approved in very special circumstances where the benefits outweigh the harm the development would cause. The Council Officers stated a school and housing do not amount to the very special circumstances necessary to justify grant of a planning application. However the Council include in their draft plan building on Blackwell Farm an area of outstanding natural beauty, Area of great landscape value and all in the Greenbelt a school or schools and housing. No special circumstances are associated with this proposed development. Any attempt to argue economic necessity for expansion of the Research Park is negated as there is sufficient land and surface car parking at the existing Research Park and Manor Farm to allow expansion for the next 25 years without allocating more greenbelt land. The Research Park is a name only as many businesses on the existing park are just businesses and with no great attachment to the University or research.

We therefore find it hypocritical of the Council to include Blackwell Farm in the revised Draft Local Plan. The extra traffic, congestion, delays and further damage to the air quality development at Blackwell Farm which would directly impinge on the two most congested junctions in Guildford at Egerton Road / A3 and A31 /A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to policy E4 Research Park expansion and we object to policy A26 Blackwell Farm.

The Council are proposing development on AONB, AGLV and Greenbelt land where there is no special circumstances and where such development will add to congestion and air quality issues which are already of serious concern to Residents and Businesses.

The Council objected to Waverley Plans for development at Dunsfold siting the impact of extra traffic, congestion etc to the A3 and also the Council object to development of a School and Housing at Fairlands (Rokers) in Worplesdon as inappropriate development which failed to mitigate its impact on infrastructure and the impact on the habitat of flora and fauna and the Council planning officers referred to the fact that the site was in the Greenbelt where there is a general presumption against inappropriate development. The Council Officers further stated that large scale residential development and a new school are inappropriate development which could only be approved in very special circumstances where the benefits outweigh the harm the development would cause. The Council Officers stated a school and housing do not amount to the very special circumstances necessary to justify grant of a planning application. However the Council include in their draft plan building on Blackwell Farm an area of outstanding natural beauty, Area of great landscape value and all in the Green Belt a school or schools and housing. No special circumstances are associated with this proposed development. Any attempt to argue economic necessity for expansion of the Research Park is negated as there is sufficient land and surface car parking at the existing Research Park and Manor Farm to allow expansion for the next 25 years without allocating more greenbelt land. The Research Park is a name only as many businesses on the existing park are just that businesses and with no great attachment to the University or research.

We therefore find it hypocritical of the Council to include Blackwell Farm in the revised Draft Local Plan. The extra traffic, congestion, delays and further damage to the air quality development at Blackwell Farm which would directly impinge on the two most congested junctions in Guildford at Egerton Road / A3 and A31 /A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Council objected to Waverley Plans for development at Dunsfold siting the impact of extra traffic, congestion etc to the A3 and also the Council object to development of a School and Housing at Fairlands (Rokers) in Worplesdon as inappropriate development which failed to mitigate its impact on infrastructure and the impact on the habitat of flora and fauna and the Council planning officers referred to the fact that the site was in the Greenbelt where there is a general presumption against inappropriate development. The Council Officers further stated that large scale residential development and a new school are inappropriate development which could only be approved in very special circumstances where the benefits outweigh the harm the development would cause. The Council Officers stated a school and housing do not amount to the very special circumstances necessary to justify grant of a planning application. However the Council include in their draft plan building on Blackwell Farm an area of outstanding natural beauty, Area of great landscape value and all in the Green Belt a school or schools and housing. No special circumstances are associated with this proposed development. The Council Officers stated a school and housing do not amount to the very special circumstances necessary to justify grant of a planning application. Any attempt to argue economic necessity for expansion of the Research Park is negated as there is sufficient land and surface car parking at the existing Research Park and Manor Farm to allow expansion for the next 25 years without allocating more greenbelt land. The Research Park is a name only as many businesses on the existing park are just that businesses and with no great attachment to the University or research.

We therefore find it hypocritical of the Council to include Blackwell Farm in the revised Draft Local Plan. The extra traffic, congestion, delays and further damage to the air quality development at Blackwell Farm which would directly impinge on the two most congested junctions in Guildford at Egerton Road/A3 and A31/A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like the removal of sites A46 and A47 from our area development - there is no way at all for these sites to be supported by the current infrastructure in the area and these developments will further deteriorate the area and increase traffic and congestion which is currently out of control.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3284  Respondent: 17405697 / Eric Marie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like the removal of sites A46 and A47 from our area development - there is no way at all for these sites to be supported by the current infrastructure in the area and these developments will further deteriorate the area and increase traffic and congestion which is currently way out of control.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---


Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3 Land Constraints

3.1 Policy S2: Planning for the borough – our spatial development strategy represents a central element of the Proposed Local Plan. The policy establishes the approach and spatial distribution of growth across the borough. Importantly, it also looks to balance required growth against the land designations and environmental characteristics of the area. In working to achieve this balance policy S2 adopts a sequential preference for town, appropriate village and brownfield land development.

3.2 However, the policy also recognises the that:

‘Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need’ (paragraph 4.1.8).
3.3 As such, a limited number of large strategic sites are released around the Ash and Tongham Green Belt area, through town extensions and a proposed new settlement. This is in order to help accommodate future housing need with the dual intention of preserving the rural character and landscape designations across the borough.

3.4 Specifically, the Proposed Local Plan underlines the importance of the Surrey Hills AONB, the Metropolitan Green Belt (covering around 89% of the borough), countryside designations and Thames Basin Heath SPA. Given these land constraints and the implied limits reached in and around Guildford, the borough’s principle settlement, any future housing delivery options are likely to be very restrained without beginning to undermine the principles of sustainable development.

3.5 Given the extent of land constraint across the borough, and the resulting pressure on future growth options, we consider it unreasonable that the Council has not pursued more contingency discussions through the duty to cooperate, in order to address the potential for housing under delivery and resultant unmet housing need.

4 Housing Trajectory and Land Supply

4.1 The Guildford Borough Land Availability Assessment: 2017 Addendum outlines the current housing trajectory and reinforces the principle that the Proposed Local Plan is dependent on a limited number of backloaded larger site releases. These are the strategic sites discussed above in relation to Policy SC2 and are relied upon to deliver against the longer-term housing need throughout the mid to latter stages of the Proposed Local Plan period.

4.2 Within a context of land restraint, these strategic sites will all require simultaneous and prompt delivery in line with projected timescales in order to successfully and consistently meet housing need. This is with little margin for slower build out rates. Given the scale of these sites and the associated extent of infrastructure required to facilitate their development this is considered to be a very aspirational approach to planned development and raises doubt over the ability to meet housing need locally in the longer-term.

4.3 Adding to this, the housing trajectory is reliant on the build out of a number of approved, smaller sites across the borough in the shorter-term. Again, we consider this approach aspirational in the context of the current 630 dwelling shortfall in delivery since 2015, the limited 2.36 years of identified housing land supply and the operation of an additional 20% buffer to account for persistent under delivery. This is suggestive of an early under delivery of housing in the borough which will likely be compounded throughout the period through to Local Plan adoption and, ultimately, place greater reliance on the delivery of larger sites.

4.4 Given the apparent limitations on the long and short-term housing trajectory, in particular the reliance on backloaded larger sites, we consider that the Council needs to act fully and promptly through the duty to cooperate process to discuss contingency options which address any short fall in housing delivery and the resultant impact on the ability to deliver against housing need in the borough.

5 Conclusion

5.1 As demonstrated through this representation we consider that currently the Council have not acted fully to comply with the legal duty to cooperate. Current evidence points towards more of a technical process that fails to fully account for contingency against existing and potential unmet housing need across the West Surrey HMA. In relation to the borough this is particularly pertinent in light of local land constraints and a high reliance on a limited number of backloaded strategic sites, which, in the context of current housing under delivery, will likely result in an inability to meet housing need in the future.

5.2 We consider that it is important to resolve this issue before the adoption of a Local Plan for Guildford. As a part of this the Council should look to speak directly with Waverley Borough Council through the duty to cooperate process under the expectation that Waverley may need to adopt a proportion of Guildford’s unmet housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1 Introduction

1.1 This statement of written representation prepared by Planning and Design Group (UK) Limited (“P&DG”) is made on behalf of our client Rowen Properties (London) Ltd in response to Guildford Borough Council’s (‘the Council’) consultation on the Proposed Submission Local Plan: Strategy and Sites, 2017 (‘the Proposed Local Plan’) for the borough.

1.2 Our representation is made in the context of seeking to work with the Council to ensure that an effective, sound and deliverable plan for the area is achieved. These representations have regard to the land that Rowen Properties control in Badshot Lea, Farnham within close proximity to the Council’s western boundary with Waverley Borough Council.

2 Executive Summary

2.1 This representation responds specifically to question four of the Council’s consultation exercise, in particular addressing compliance with the legal duty to cooperate. In doing so we will also draw and make comment on wider evidence presented by the Council.

2.2 It is considered that the Council, operating within the context of the West Surrey Housing Market Area (HMA), have not acted to fully comply with the duty to cooperate. Specifically, that evidence presented around the duty relating to housing delivery represents only a limited technical exercise and contains little contingency for meeting existing and potential unmet housing need locally. Whilst the evidence in the recent duty to cooperate thematic paper is recognised it is felt far more needs to be addressed on the matter.

2.3 In light of the apparent land constraints across the borough and a high reliance on a limited number of backloaded strategic sites to address housing need, a more diligent contingency is expected from the Council through the duty to cooperate. This should cover the shared and agreed approaches to delivering any and all unmet housing need in the event of under delivery across the boundaries of the HMA. Furthermore, it is considered that detailed conversations should be had with Waverley Borough Council about this issue prior to the adoption of the Council’s Local Plan. This is on the basis that Waverley may need to adopt a proportion of Guildford’s unmet housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like the removal of sites A46 and A47 from our area development - there is no way at all for these sites to be supported by the current infrastructure in the area and these developments will further deteriorate the area and increase traffic and congestion which is currently way out of control.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/3314  **Respondent:** 17406209 / Guildford Vision Group (Andrew Black)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY A1 - The Plaza, Portsmouth Road, Guildford**

4.5 GVG would support this site coming forward for redevelopment and notes that an application has been submitted for 104 C2 units. GVG is interested to see if high quality design standards will be applied by GBC to this site, and if the massing is deemed to be appropriate to this location. The two disastrous high rise council blocks, directly opposite, should not be seen as a guide for what might be acceptable for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/3367  **Respondent:** 17406209 / Guildford Vision Group (Andrew Black)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A14

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY A14 - Wey Corner, Walnut Tree Close, Guildford**

4.31 This site needs to be considered as a single strategic parcel alongside other sites in WalnutTree Close such as A10 and A13. This ribbon of land sandwiched between rail and river is capable of providing a much better contribution to Guildford.

4.32 GVG support the principle of the scheme being allocated for development but would like to see a co-ordinated masterplan approach to sites in Walnut Tree Close.

4.33 In relation to policy A9, A10 A13 and A14, GVG considers that the entire area of Walnut Tree Close should be allocated for medium density, mixed use development, rather than taking the piecemeal approach that is analogous to the approach of GBC to the rest of the town centre.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3370</th>
<th>Respondent:</th>
<th>17406209 / Guildford Vision Group (Andrew Black)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A24</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**POLICY A24 - Slyfield Area Regeneration Project, Guildford**

4.34 GVG consider this to be a highly constrained site which includes flood risk, ecological and landscape constraints. It is noted that 11ha of the 40ha site is allocated for wastemanagement purposes under the development plan for the area. Once the other uses, such as industrial, open space, and areas for flood risk are accounted for, this would leave a constrained area to bring forward the proposed 1,500 units which would inevitably have to be delivered at a high density.

4.35 In addition to the proposed extension of Slyfield to the south (which is destined to be developed for residential uses at a considerable density) GVG recommends exploring an extension to the north for additional employment uses and a north Guildford Park & Ride at one end of the proposed Sustainable Movement Corridor. This can be achieved by removing an area of Green Belt that is former landfill with a narrower permanent green screen between the employment zone and neighbouring inset village of Jacobs Well. We also note the Plan is silent as to whether Slyfield might be the centre for CCHP facilities.

4.36 Given the high amount of industrial and commercial space to the north of the site, GVG consider that this would be a more suitable site for the relocation of industrial and commercial uses from the Walnut Tree Close and Woodbridge Meadows sites. Woodbridge Meadows is best suited to high density, high rise residential development and leisure space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3378</th>
<th>Respondent:</th>
<th>17406209 / Guildford Vision Group (Andrew Black)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
POLICY A35 - Former Wisley airfield, Ockham

4.40 The concerns around highways impact as set out against policy A26 remain the same for this site. GVG is more concerned that the size of site, at 2,000 units, is not big enough to support the proposed community in its own right. GVG believes the development of this site will lead to substantial pressure on the existing infrastructure, both locally and in Guildford town centre, and this is not currently mitigated under the proposed Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/3327  **Respondent:** 17406209 / Guildford Vision Group (Andrew Black)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A4 - Telephone Exchange, Leapale Road, Guildford

4.11 It is noted that this site has now been removed as an allocation within the Local Plan. The reason stated within the summary of changes is that the site is no longer available but the reason for this is not clear.

4.12 It is understood that the lease of the current occupier will expire by 2025 which is within the lifetime of the proposed Local Plan. It is the position of GVG that this site remains a suitable site for housing and should be considered for CPO by GBC if no longer available. The communications infrastructure contained within the site could be relocated as part of any redevelopment of this site or as part of the adjoining North Street development.

4.13 Alternatively the building could be converted into residential use with the limited amount of communications equipment remaining in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/3379  **Respondent:** 17406209 / Guildford Vision Group (Andrew Black)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A46 - Land to the south of Normandy and north of Flexford

4.41 GVG notes that this site has now been excluded as a proposed site within the Local Plan. The reason set out within the summary of changes accompanying the Local Plan states that an alternative and preferable location for the new secondary school has been found which removes the exceptional circumstances to justify this site.

4.42 Given the sustainable location of this site in close proximity to Wanborough Station, it is disappointing that this site has been deleted. The sustainability appraisal (by AECOM) highlighted ‘new residents would have excellent access to the Wanborough train station’. Whilst the secondary school may no longer be required on the site, other uses should be considered on the site which would justify the exceptional circumstances of the site coming forward for development.

**Overall Commentary on plans for housing provision.**

4.43 GVG has provided a comparison of housing delivery between GVG proposals and GBC plans in appendix 9. GVG proposals can deliver approximately 3,367 homes (including student and retirement dwellings) compared to GBC plans of 931 homes in the same area. GVG plans achieve

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/3328  **Respondent:** 17406209 / Guildford Vision Group (Andrew Black)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

**POLICY A5 - Jewsons, Walnut Tree Close, Guildford**

4.14 GVG supports the development of this key site and the quantity of housing allocated on the site. However GVG identifies the potential for this site to accommodate 132 dwellings in addition to an enhanced medical centre which can serve both the existing community, university campus and the predicted increase in local population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/3377  **Respondent:** 17406209 / Guildford Vision Group (Andrew Black)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A59 - New rail station at Guildford West (Park Barn)

4.39 GVG supports the use of this site for a new railway station. In order to encourage modal shift it is important that the town centre sites around Guildford Train Station accommodate the new platforms and infrastructure to allow for an increase in domestic rail services to this station from the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3333  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A6 - North Street redevelopment, Guildford

4.15 This is a key site for Guildford Town Centre and GVG supports the redevelopment for a range of uses. It is noted there have been four separate failed schemes by MEPC, Hermes, Westfield and Land Securities respectively. It is clear that the successful redevelopment of the site, as envisaged by GBC for decades now, is highly dependent on securing a main anchor tenant. Discussions have been ongoing for some time with John Lewis. It is clear from recent publicly available information that John Lewis, and indeed many anchor retailers, are unlikely to open any additional stores at present (appendix 8) beyond those identified already.

The site should be developed with town centre uses but not subject to overdevelopment.

4.16 It is noted that the proposed 41,000 sq m of comparison retail floorspace and 6,000 sq m of food and drink is the same as the forecast for the total borough-wide floorspace capacity for comparison shopping and food and beverage uses as set out at para 4.40 in the Retail and Town Centre Topic Paper up to 2030. The current proposals for this quantum of retail space and 400 dwellings appears to be overdevelopment of the site; when the allocation claims the total retail allocation for the borough. The town centre masterplan will require retail and leisure accommodation at ground floor to create the appropriate quality of environment. This site has not, to date, been included in the GVG Masterplan as it was considered to be at an advanced stage of development. With the likely absence of a major department store and question marks over the site, the site should be redesigned and masterplanned to contribute to needs of an integrated town centre.

4.17 It is therefore considered that GBC needs to consider alternative schemes for this site, including its capacity for more housing, in order for the site allocation to be considered as sound. It is also considered that this is a more suitable site for the relocation of the cinema from site A2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3361  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>POLICY A9 - 77 to 83 Walnut Tree Close, Guildford</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.24 The GVG Masterplan shows this site as open space to access the new open space adjoining the River Wey. The Allies and Morrison Plan also shows this site as open space and a key access point to the wider area of open space.</td>
</tr>
<tr>
<td>4.25 It is therefore unclear why it has been allocated for 3,000 sq m of office space in isolation without consideration of the site immediately to the north or the wider area.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1601  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D2</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>POLICY D2: Sustainable design, construction and energy</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.56 GVG supports the laudable policies on ensuring new development minimises the need for heat and energy through quality design and construction, and requiring developers to provide statements as to how this is to be achieved. However, GVG is concerned that the Plan has only taken a very narrow view of the “Energy” position, both in the UK and locally, only to minimum NPPF requirements. Requiring developers to utilise only Renewable Energy Sources and then not making any provision for them in the Plan will, in effect, limit the amount of new development possible in the Borough. The GBC-commissioned report by the Centre for Sustainable Energy concluded that only very limited amounts of Renewable Generation was “deployable”.</td>
</tr>
<tr>
<td>3.57 The Policy section on Energy does not extend far enough into either the general shortage of supply of any energy or the demand side. It does not allow for, amongst others, the impact of electric vehicles, the use of Smart Grids and Battery Farm Storage potential. There is also no mention of the potential for Carbon Sequestration.</td>
</tr>
<tr>
<td>3.58 GVG takes the view that a review of the general energy provision, both from the National Grid and Renewable Sources needs to be included in the plan. The Local Distribution network operator needs to be consulted as to what power availability there is to support the Borough’s aspirations for both economic and domestic development.</td>
</tr>
<tr>
<td>3.59 Options for Renewable Local Embedded Energy Centres need to be part of any Plan, along with the consideration of the application of smart grids and battery storage farms. Financial support from the CIL levy could support retrofitting on large warehouse roofs at Slyfield and other big industrial estates, for instance, as GBC is the freehold owner of a number of the industrial estates. Advanced Thermal treatment is in wide use throughout Scandinavia, Europe and the Far East and there are an increasing number of plants in the UK. This has the potential to provide substantial renewable power and heat</td>
</tr>
</tbody>
</table>
locally. The minimum requirement should be for all new development to be linked into Smart Grids which then manage and reduce significantly the power usage automatically.

3.60 GVG believe a far more proactive approach is needed to the consideration of energy and heat provision in the Plan, leading our town towards a low and zero carbon future whilst still promoting growth, new jobs and homes. As it is, the Plan seeks merely to pass this on to individual developers to deal with the matter on a piecemeal basis.

3.61 Only a comprehensively masterplanned town centre will enable sustainable energy to be harnessed and employed successfully and productively. The masterplan approach favoured by GVG would enable sites to be planned in a conjoined way and make it possible to deliver a unique energy network in the town centre with the ability for future phases of development to plug into this in later years of the Plan process. Piecemeal planning will not achieve that outcome and the town centre is one of only three areas in the borough where such benefits can be achieved.

3.62 Section 4 of policy D2 sets out that combined cooling heating and power (CCHP) networks will be strongly supported and encouraged. However, the current piecemeal approach being taken to different sites within the town centre by GBC will hamper the viability and deliverability of a CCHP network. The Plan is silent on any potential sites for CCHP central facilities, GVG believes the Slyfield Regeneration Proposals offers potential to provide a ‘state of the art’ CCHP facility.

3.63 Overall, the aims of this policy need to be fundamentally reconsidered and the council must recognise the role which a properly masterplanned town centre has to play in the delivery of this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1594</th>
<th>Respondent: 17406209 / Guildford Vision Group (Andrew Black)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

**POLICY E1 - Meeting employment needs**

3.31 Policy E1 has been revised to reflect the change in the lifetime of the Local Plan. However, as a result, the number of class B1 jobs has been increased from 3,200 to 4,100. The reason for this increase is unclear and has not been referenced within the summary of changes to the Local Plan which accompanies the document. However, in direct contradiction to this increase, the amount of floorspace allocated for these jobs has decreased from a range of 37,000-47,000 sq m to a range of 36,100 - 43,700 sq m. Again the reason for this change remains unclear and requires further clarification. GVG recognises and supports the success of the University of Surrey in supporting the formation of a series of technology based industries in the borough. The Plan should recognise the need to support this growth, both at the research park, and elsewhere in borough by the provision of appropriate accommodation.

3.32 GVG believes the allocation of the Walnut Tree Close and Woodbridge Meadows sites as employment zones is consistent with backward-looking planning but not the forward-looking Plan that GVG is seeking. If 10 Ha of employment land from both of these areas was relocated to either the Gosden Hill Farm or Blackwell Farm allocations (both to be served by the SMC and new rail stations), they would displace land for appropriate residential densities at 30-40 dwellings per hectare (DPH) giving a total of up to 400 homes. However, the area which would be created at Walnut Tree Close and Woodbridge Meadows through rezoning would be appropriate for densities of up to 200 DPH delivering up to 2,000 homes. This would deliver a net increase of 1,600 homes across the lifetime of the Plan for an equivalent land take.
POLICY E2 - Location for new employment floorspace

3.33 The first part of policy E2 sets the sequential approach which needs to be followed to determine where new office and research & development floorspace will be located. Guildford town centre has given preference to areas within 500m of a transport interchange, and then to strategic employment sites.

3.34 The second part of policy E2 has been changed to now state that the sequential approach does not apply to proposed floorspace included in the site allocations in the Local Plan.

3.35 The inclusion of this part of the policy significantly undermines the overall strategy for the provision of floorspace in the borough. The addition of this wording is in direct contradiction to the first part of the policy which directs development to the town centre. It now demonstrates that there has been little rationale to including employment space on the strategic allocations other than to meet the need specified in policy E1.

3.36 Paragraph 4.416 within the definitions section of policy E2 states that:

When developed, the two new rail stations, Guildford East (Merrow) and Guildford West (Park Barn), will each be treated as a transport interchange.

3.37 GVG has considered the impact of Guildford West (Park Barn) being considered as a transport interchange. This would reinforce the rationale of GVG promoting the provision of high density, residential units on Woodbridge Meadows with provision of health, retail and leisure facilities alongside the amenity of the River Wey navigation. It is the most sustainable and arguably deliverable site in close proximity to the town centre where the freehold is mostly owned by the council. GVG identifies the ability to provide 1,300 dwellings at this location in addition to 5,000 sq m of other uses including retail, health care and sports facilities.

3.38 GVG has also considered the impact of the proposed Guildford East (Merrow) station being considered as a transport interchange. It supports this proposal as it enables access to employment both in the town centre and in the research park via the rail network (Guildford West). GVG notes careful phasing of rail station development, and associated rail services, is required to bring the infrastructure into operation before housing and commercial space is made available in large quantities.

3.39 Whilst Woodbridge Meadows is zoned for Employment Uses in the Plan, there is no specific allocation or strategic site. This is despite the freeholds being in the Council’s ownership significant amounts of land being vacant or underused and the need for a comprehensive flood protection scheme to hold water upstream of the constraint caused by the 1930s A25 Guildford Bypass southbound bridge which is low over the river.
POLICY E6 - The Leisure and Visitor Experience

3.40 The introduction to policy E6 sets out the aspirations of GBC for leisure and visitor experience and at paragraph 4.4.56 text has been added to state that:

*The Local Plan aspires to improve and diversify the leisure and visitor experience in the borough. Stimulating vibrant town and district centres, encouraging the provision of additional visitor and business accommodation in appropriate locations, protecting our special natural landscapes and preserving our historic built environment will be important to achieving this. GVG wholeheartedly agrees with this statement of intent from GBC but this.*

3.41 underlines the importance for a more co-ordinated approach to the development of the town centre than is currently being planned for under the draft document.

3.42 It is recognised that retailing is undergoing a major transition and complementary leisure experiences are essential in order to extend dwell times. Guildford is clearly well placed to bring forward the River Wey navigation as a visitor experience, complementing amenities such as the Castle, Sports Centres, and surrounding Green Belt. The introduction of pedestrianisation and removal of traffic from the town centre, which are not provided for in the Plan, can produce additional benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Policy E7 - Guildford Town Centre

3.43 In the introductory text to Policy E7 the Vision, as previously set out, has been removed and replaced with reference to the Guildford town centre as described in the spatial vision on page 22 of the draft Local Plan.

3.44 The removal of the vision for Guildford town centre and replacement with more generic spatial vision for the borough fundamentally undermines the thrust of Policy E7 and is again indicative of the watering down of the ‘town centre first’ approach by GBC in meeting the development needs of the borough or aspirations of the community. It is recognised that GBC may not have the skills, resources or appetite to deliver major solutions but others have, and a quality Local Plan is an essential pre-requisite to delivery.

3.45 Later at 4.4.74, additional text has been added in reference to public realm which now states that:

*We will ensure the public realm is enhanced and insist that all new development will be of the highest design and environmental standards. We will also take opportunities to reconnect the own centre to the amenity of the riverside.*

3.46 This again highlights the piecemeal approach to development of the town centre which is being taken by GBC. If public realm is to be delivered to the highest quality then a coordinated approach is required, such as that demonstrated by the GVG Masterplan. The GVG Plan brings together the riverside with the pedestrian areas of the town centre through planned and connected cycle routes and footpaths along desire lines while removing the serious blight of traffic from pedestrian and activity concentrations.

3.47 Turning to policy E7 itself, text has been deleted from this policy which previously stated that by 2033 Guildford town centre will have:

- More varied uses during the evening and night time, including along the riverside with residents and visitors feeling safe;
- Active use of the riverside and river;
- More effective routes within and across the town centre for pedestrians and cyclists;
- New public squares and other informal meeting areas.

3.48 It is unclear why these elements of policy E7 have also been removed as GVG considers them to be vital in order to achieve successful regeneration of the town centre. No explanation has been offered by GBC as to why these have been excluded from the Plan and it is requested that these are reintroduced as part of policy E7.

3.49 The council in para 4.4.87 states that it will work with partners to deliver the Local Plan and to progress further opportunities within the Guildford Town Centre Regeneration Strategy. No such work has taken place with The Guildford Society, GVG, or Guildford Residents Association and accordingly the ambitions of the community have not been embraced.

3.50 In the Reasoned Justification section following the main policy text, further wording has been removed at para 4.4.86 which related to flooding. As set out previously within these representations, the issue of flooding within the town centre is a vital issue which requires a co-ordinated approach as advocated within the GVG Plan. It is therefore necessary to reintroduce this wording and strengthen it where necessary to reinforce the importance of flood solutions as part of the regeneration of the town centre.

3.51 The Allies and Morrison draft Town Centre Vision 2015 and draft Guildford Town Centre Masterplan 2015 have been removed from the Key Evidence supporting this policy with only the Guildford Town Centre Regeneration Strategy remaining in place. This document is considered by the council as having no planning status and can accordingly be ignored by developers. This demonstrates the lack of detailed vision or commitment towards the town centre issues and opportunities on behalf of GBC and highlights the robustness of approach taken by GVG in the vision for the wider area.

3.52 Having reviewed the Guildford Town Centre Regeneration Strategy, GVG consider it to be an inadequate document which is flawed on many levels. It fails to recognise or address the key issues on all infrastructure and highways. These require resolution as part of a successful regeneration of the town centre. GVG attributes little weight to the Town Centre
Regeneration Strategy and considers that it does not provide an adequate evidence base on which to inform the strategic decisions for either GBC or developers across the lifetime of the emerging Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1587</th>
<th>Respondent:</th>
<th>17406209 / Guildford Vision Group (Andrew Black)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
</tbody>
</table>

**POLICY H1: Homes for all**

3.8 GVG supports the focus within the Local Plan to provide high quality homes to meet a range of needs across the borough.

3.9 The reasoned justification in para 4.2.3 sets out the need for development as supported by the SHMA and addendum report 2017. This demonstrates that there is a high need for one bedroom (40%) and two bedroom (30%) dwellings. These dwellings are clearly more suitable in a town centre environment and this provides further justification for the role of Guildford town centre as recipient of housing. It highlights the requirement for a comprehensive regeneration of the town centre to be placed at the centre of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1588</th>
<th>Respondent:</th>
<th>17406209 / Guildford Vision Group (Andrew Black)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
</tbody>
</table>

**POLICY H2: Affordable Homes**

3.10 GVG supports the provision of affordable housing as part of providing mixed and sustainable communities across the borough.

3.11 However, under the second bullet point of policy H2, it states that the Council will seek affordable homes on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes.
3.12 This policy does not reflect the established national policy as set out in the Written Ministerial Statement of 28
November 2014. The Council can only implement a lower threshold, where schemes of six or more dwellings can
contribute cash payments towards affordable housing, and tariff style items, in 'designated rural areas' under Section 157 of
the Housing Act 1985. GVG is concerned that this policy will have a viability impact on the delivery of important smaller
infill sites in the town centre that will contribute towards the successful regeneration of the wider town centre.

3.13 It is therefore suggested that this policy is amended to ensure it is viable, deliverable and consistent with national
guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp171/1602 | Respondent: | 17406209 / Guildford Vision Group (Andrew Black) | Agent: |
|-------------|--------------|-------------|-------------------------------------------------|

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY ID1 - Infrastructure and Delivery

3.64 The NPPF sets out at para 162 that:

*Local planning authorities should work with other authorities and providers to:

- assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy
  (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change
  management, and its ability to meet forecast demands

- take account of the need for strategic infrastructure including nationally significant infrastructure within their area

3.65 GVG recognises the vital importance of the new infrastructure that will be required to support and mitigate the impact
of the growth set out in the Local Plan.

3.66 Paragraph 4.6.2 sets out the wider definition of Infrastructure under the Planning Act to include roads and other
transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational
facilities, and open spaces, all of which are recognised and addressed within the GVG Masterplan.

3.67 The policies immediately following policy ID1 set out the strategy for road investment (ID2), sustainable transport
(ID3), and green and blue infrastructure (ID4). However there is no other specific policy relating to other infrastructure, as
defined under the Planning Act, to include flood defences, schools and other educational facilities, medical facilities,
sporting and recreational facilities, and open spaces.

3.68 In relation to rail infrastructure, GVG, as part of its Plan, has produced detailed proposals for the station quarter which
enhances the connection of the rail station to bus, road, rail, cycle and footpaths. GVG recognise the required 40% increase
in capacity described in the Wessex Plan, Heathrow Southern Rail Access and other studies and has designed new
platforms and a modern transport interchange for the future. Increases in services and new journey opportunities afforded
by Guildford East and West Stations plus regular services to the villages south east of Guildford, Heathrow etc. will result
in the rail station becoming an even more significant hub for the region. The GVG Plan includes detailed proposals for the
rail station quarter which enhances the connection of the station to bus, road, rail, cycle and footpaths.
3.69 There is a requirement to consider other essential infrastructure if the Local Plan is to be found sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1603  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY ID2 - Supporting the Department for Transport's 'Road Investment Strategy'

3.70 As already set out in this consultation response, GVG has concerns that the local plan is silent on the plans and delivery aspirations of other key stakeholders such as Highways England.

3.71 An example of this is where the text in paragraph 4.6.17 has been removed, relating to the agreement of a statement of common ground between GBC and Highways England. In the summary of changes to the Local Plan it is suggested that this text has been removed as this will be agreed closer to the Examination. This position is concerning, as the impact of development upon the A3 and road infrastructure is critical in the development of the Local Plan and it is therefore vital that this is agreed at consultation stage if the Plan is to be found sound. Furthermore, if the A3 is improved as proposed, there will be clear potential for increased north-south traffic through the town and surrounding villages getting to and from the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1604  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY ID3 - Sustainable transport for new developments

3.72 A substantial amount of text and additional policy has been added to policy ID3 in relation to sustainable development, however, most of this text relates to vehicle movements and car parking.
3.73 GBC is assuming substantial modal shift in the town centre. GVG supports this aspiration. However, GVG believes the scale of modal shift proposed by the council – around 40% - will be very difficult to achieve due to the continuing need to access the town centre for retail and commercial activity and the Rail Station.

3.74 The inserted text at para 4.6.30a relates to Guildford town centre and recognises the congestion problem, especially the gyratory, as does GVG. The inserted text states that:

This is, in part, a consequence of a mismatch between the demands for, and supply of, public off-street car parking on the different approach needs. The policy with respect to the provision of additional public off-street car parking is designed to reduce the impact of these trips on traffic volumes and congestion in the town centre. This planning policy will complement future environmental improvements in the town centre realising the Council’s 'drive to, not through' concept.

3.75 GVG does not accept this explanation for congestion or the proposed solution.

3.76 The revised approach adopted by GBC on traffic completely ignores the role of Guildford as a regional and sub-regional destination. It also ignores the enhanced pull of Guildford if town centre regeneration comes forward at levels as expected by both GVG and GBC.

3.77 The approach of GBC is completely at odds with the principles of sustainable development and the requirement for modal shift away from cars to other forms of public transport.

3.78 The GBC plan is silent on measures to mitigate North South Traffic through the town centre which will be exacerbated by developments south of the borough e.g. major housing at Dunsfold and significant housing growth in Godalming. In the absence of any substantive plan to by-pass Guildford on a North-South axis, handling traffic from the A281, A3100 and A25, Guildford will have to support an increase North-South Traffic. The GVG Plan allows for traffic to be supported at current levels, whilst reducing accidents and pollution in the town centre. The GVG plan also provides for major environmental wins around areas allocated to housing, leisure, commerce and tourism in the town centre.

3.79 GVG supports the concept proposed by the council of 'drive to, not through' the GBC plan does not support this concept practically by creating provision for interceptor ‘Park and Ride’ car parks, or the better utilisation of bus and rail networks. The only new ‘Park and Ride’ in the plan appears at Gosden Hill linked to Guildford Station East proposals, but no capacity is proposed. The plan is silent on opportunities based at Shalford Station and north of the town in the Slyfied area.

3.80 GVG notes that there are approximately 5,800 car parking spaces in the town centre. Many of these spaces are in large surface parks that represent a lost opportunity for other uses. GVG are concerned that revenue generation from car parking may be clouding GBC’s long-term plan making judgement.

3.81 The masterplan as prepared by GVG demonstrates a pedestrian and cycle friendly environment where the gyratory is replaced with a new bridge link to take through traffic away from the town centre and from areas of high pedestrian activity. Whilst GVG accepts that according to the Guildford Town and Approaches Movement Study that highway interventions are generally unsuccessful in providing infrastructure solutions, the GVG crossing is about removing the maximum areas of conflict between town centre, pedestrians and vehicles. It delivers environmental improvements to the riverside, new homes, and will assist in achieving modal shift. The bridge link will also remove traffic from the proposed new housing, retail

3.82 and the visitor areas, leaving the town centre available for an improved pedestrian environment in close proximity to sustainable methods of transport, the retail core and a reconnected riverside. The GVG also allows for the creation of the proper transport interchange centred on a revised and expanded rail station. This crossing can be delivered in a phased approach without disturbing the current town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P4: Flooding

3.16 Bullet point 3 of policy P4 sets out that:

*Development proposals in the 'developed' flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s)*

3.17 The centre of Guildford is affected by flooding from the River Wey. Large parts of the town centre alongside the river are within flood zone 3b. If the wording of policy P4 is to be followed, there is no restriction, other than the established development management policies, on the height of the buildings that could be developed on the sites. The GVG Masterplan seeks to avoid earlier mistakes and addresses the central issues around flooding, to the benefit of the town centre and better provision of housing in a materially improved setting.

3.18 The flooding topic paper which forms part of the evidence base for the Local Plan sets out at para 5.9 that:

*The Council’s Level 1 SRFA notes that some of Guildford’s functional floodplain (flood zone 3b) has historically been built upon. The document therefore differentiates between the 'developed functional floodplain' and the 'undeveloped functional floodplain'. Whilst the NPPF states that the functional floodplain should be reserved for water storage and flow in times of flood, the SRFA argues that development or redevelopment in the 'developed functional floodplain' may be acceptable when flood risk betterment, appropriate mitigation and risk management can be achieved and implemented.*

*Given the findings of the Level 1 SRFA, it is reasonable to argue that the functional floodplain does not need to be entirely excluded from development and can contribute to accommodating the borough’s objectively assessed needs, if betterment, mitigation and management can be achieved.*

3.19 Whilst the main thrust of policy P4 complies with guidance on sequential and exception tests, the requirement of development proposals to not be greater than the footprint of the existing building fundamentally undermines the potential of town centre sites to deliver significant levels of housing or other uses.

3.20 The GVG Masterplan considers an innovative solution to protection of future residents from flood risk by raising the street level above current levels. It places car parking and other compatible uses on the lower ground floor or undercroft, while residential units are placed on upper floors with dry access provided in the event of a flood.

3.21 Furthermore the second point of bullet point 3 states that:

*Proposals within these areas should facilitate greater floodwater storage.*

3.22 The masterplan as prepared by GVG seeks a strategic approach to the potential for floodwater storage in areas of functional flood zone through the provision of substantial sustainable urban drainage systems. These could be accommodated under areas of public open space. The provision of large areas of tiered public open space around Guildford Wharf, Walnut Tree Close and Woodbridge Meadows will also allow for the improvement of the area of functional floodplain within the town centre.

3.23 The delivery of policy E7 in relation to Guildford town centre supported by Guildford Town Centre Regeneration Strategy 2017, with the previous links to the Allies and Morrison draft Town Centre Vision (2015) and the Guildford Town Centre Masterplan (2015) now having been deleted.
3.24 Whilst the Allies and Morrison vision and masterplan previously sought to avoid the areas of functional flood plain for development, the Guildford Town Centre Regeneration makes reference to the provision of Enhanced Amenity and Flood Protection. This section recognises the potential for development in areas of flood zone but does not satisfactorily set out a solution or conjoined strategy to deal with these fundamental issues. The document states that:

As sites and schemes are investigated in more detail, viability issues will invariably come in to play and decisions will need to be made as whether to progress certain major projects. This is one of the reasons that the Town Centre Regeneration Strategy and its associated Work Programmes are intended to be 'living, flexible documents'.

3.25 GVG submits that this level of ambiguity and lack of commitment is simply not good enough to support the delivery of material quantities of housing in the town centre. This requires a coordinated and comprehensive approach. This is what GVG recommends and have allowed for under its preferred approach for the town. The current approach of GBC (see appendix 6 with site marketing particulars) through piecemeal development of town centre sites does not allow for a co-ordinated approach to flood risk which is of significant importance for the success of the wider development strategy for the borough, or other strategic objectives such as power delivery and district centres. It also at the same time fails to positively and comprehensively address urban form that currently contributes to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1593  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P5 - Thames Basin Heaths SPA

3.26 Policy P5 requires all sites of over 50 net new dwellings to provide avoidance and mitigation measures for the SPA. The importance of the SPA and mitigation is understood and respected by GVG. However the imposition of mitigation measures on individual town centres presents a viability constraint which favours use of green belt sites rather than brownfield.

3.27 There is already a good proportion of open space within the town centre (in a borough with 89% of the land designated as green belt). More would come forward if a deliverable masterplan is approved. This can be then counted towards provision of SANG land with no requirement to provide contributions to other land outside of the town centre.

3.28 Within Guildford much of the urban area is under provided for open space on a pro-rated basis, it is the surrounding common areas that give Guildford its character and, if preserved, these should be sufficient to provide sustainable alternative natural green space for any and all development in the town centre without requiring further SANG. The increased riverside park proposed by GVG (and the Allies and Morrison plans) would add to the provision of accessible green space for residents and visitors to the town centre.

3.29 It is therefore suggested that the requirement for town centre sites, developed as part of a comprehensive plan, to contribute to SANGs land is removed from the Local Plan to increase the viability of these sites to develop sufficient affordable housing units, and to help meet the additional infrastructure burden.
3.30 The Evidence Base includes a viability assessment dating from 2014 which is considered to be historic in plan making terms and should be updated. The Infrastructure Delivery Plan has gone from 'the developer will contribute' to 'funded by the developer'. Affordable housing viability comes after SANG, CIL s106 and so forth. There is absolutely no indication in the Local Plan that a single affordable housing unit would be built on this basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1584  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Introduction and Background Information

1.1 PRP was formally appointed by Guildford Vision Group (GVG) in May 2017 to represent it in the submission of a detailed response to the regulation 19 consultation on the proposed submission Local Plan for Guildford Borough Council (GBC).

1.2 Guildford is a gap town and the focus of a number of particular problems. The town has confined road, rail and river corridors, topographical issues and a historic core, all of which add to the complexity of Guildford along with a major investment deficit in infrastructure.

1.3 GVG, which is comprised of people who have long resided in the borough, and who often have relevant professional expertise on planning matters, was established on 21st March 2012 at a public meeting with the aim of working towards a deliverable masterplan for Guildford. Initial activity analysed the state of the town centre and identified 17 issues. Several background documents are appended to this consultation response, including The History of GVG (appendix 1), and 'Who is GVG' (appendix 2).

1.4 GVG produced a document in 2013 entitled 'Guildford on the Way' (appendix 3) which serves as a helpful summary of the aims of the group and was supported by members of the public and included their contributions. This document was submitted as part of the response to the Guildford Local Plan Regulation 18 consultation in 2014 by both GVG and The Guildford Society.

1.5 GVG has identified 17 key issues related to the town centre which require addressing:

1. Road safety
2. Pollution
3. Traffic blight
4. Traffic management
5. Lack of pedestrianisation
6. Proper use of riverside
7. Flood prevention
8. Railway station
9. Bus station
10. Cycleways
11. Access and parking
12. Housing
13. Student accommodation
14. Business space
15. Social buildings
16. Arts & education provision
17. Leisure facilities

From these 17 issues GVG has set itself six keys goals to transform

1.6 the town centre:

1. Wider pedestrianisation of the town centre
2. Exciting new public space and a reinvigorated riverside
3. Redirection of traffic away from the town centre
4. An integrated road and rail hub
5. More town centre housing
6. A new bridge for a better East-West link

1.7 Sustainable, environmental and infrastructure solutions can be forthcoming but only realistically with comprehensive, integrated and master planned solutions. The draft local plan fails to recognise or make a case for this, or any approach to capture and address any of the '17 issues' GVG has identified.

1.8 GVG notes that, although Guildford has been one of the most economically successful towns over the past 30 years, this position is under threat from infrastructure deficit and a lack of commercial space and housing. GVG also notes the emerging desire, via LEPs and County Councils, to collaborate in an arc of towns around London, stretching from Cambridge via Oxford to Reading, Guildford and Ashford. This is a major opportunity for high tech businesses in particular to collaborate. Guildford, with the right vision and leadership, can build on its strengths, based on the University and the associated Research Park, to take advantage of this opportunity.

1.9 Town centres are subject to major challenges due to changing patterns of retailing, new transport possibilities e.g. autonomous cars, and the need to become far more environmentally benign. GVG believes the Plan is a missed opportunity to position Guildford town centre for the future.

1.10 In particular, land use for the whole of the town centre has not been considered effectively e.g. GVG is aware of several sites that may be subject to redevelopment in the planning horizon that are not in the Plan. Environmental factors are also inadequately covered e.g. District heating, power generation and flooding. Finally, traffic issues are not addressed nor the interchange between modes of transport.
1.11 The draft plan proposes a Guildford with a quantum leap in shopping space that will be inaccessible due to inadequate transport provision. New housing is scattered around the edges of the town centre with inadequate provision made for transport and other facilities. Proposed employment centres may exacerbate transport difficulties e.g. more cross-town commuting.

1.12 The GVG proposals provide an opportunity to build an environmentally friendly town centre, with the flexibility to optimise housing and commercial space.

1.13 A key ambition of GVG is to enable growth whilst delivering environmental quality for the community through a comprehensive, masterplan-led solution. The current draft Local Plan fundamentally fails to consider how this can be achieved in the town centre, and indeed the wider borough. These fundamental goals are central to this consultation response and are relevant to many of the specific policies being consulted on.

1.14 In 2016, GVG persuaded the council to commission a town centre masterplan, the first of its kind since 1943, through Allies and Morrison Urban Designers. However, GVG was concerned that the undisclosed brief did not require the masterplan to adequately address road and other infrastructure issues. Accordingly, GVG feels it has had limited value. In response to the perceived limitations of the masterplan and using professional town planners, GVG has commissioned and published its own masterplan for the entire town centre (appendix 4) in January 2017. This has received support through press, newsletters and social media and at a number of public events.

1.15 The National Planning Policy Framework (NPPF) is very clear on the role which town centres have to play in the growth of boroughs:

Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.

Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a town centre first’ approach and taking account of specific town centre policy.

1.16 It is considered that the draft plan presented by GBC has fundamentally failed to consider this most basic of planning principles and on this issue alone the Plan is unsound. There are a number of more specific planning policies on which GVG has comments. They are addressed in turn throughout this document.

1.17 This submission builds upon much of the previous work undertaken by GVG which has submitted representations on the previous consultations of the Local Plan in 2014 and 2016 (appendix 5).

1.18 The Regulation 19 consultation includes a significant amount of red-lined (amended) text and policies, each and many of which will, separately and in the context of the entire Local Plan, have some impact on other elements - particularly on the town centre and its crucial infrastructure. It also substantially alters the evidence base without any impact assessment on the Local Plan itself and on any unaltered policy and associated commentary. In its response GVG has attempted (to the best of its ability) to assist the Council to understand how the proposed submission draft Local Plan falls short of the requirement to be a forward-looking Plan that is balanced and sound.

1.19 The GVG Masterplan has been prepared to meet all stated criteria of the policies in the draft Local Plan, as well as meeting criteria to mitigate the 17 issues identified by the group. In addition, it has tested its masterplan to ensure that it is practical and deliverable. GVG has concerns, as detailed below, that the draft plan is not sound and will fail to be pass examination stage, with consequential impact on Guildford and its environs.

[Extract from GVG Masterplan - appendix 4]

1.20 Overall the draft Local Plan demonstrates reluctance by GBC to build new housing before infrastructure is provided. Whilst GVG understands this reluctance it does not demonstrate the forward thinking that is required for Guildford over the next 20 years. It does not provide solutions which GBC can begin to implement without fundamental reliance on external...
agencies (as is the case with much of the enabling infrastructure in the draft submission Local Plan). If the Plan is carried out as presented by GBC, there will be an increase in population in the wider borough with none of the associated increase in social or physical infrastructure that is required. The pressure that will be put on Guildford town centre from the growth of the borough, and indeed that of surrounding boroughs, will lead to excessive stress on the already failing infrastructure in the town.

1.22 Through properly masterplanning the town centre, alongside a fundamental redesign of the physical infrastructure, the GVG Plan is able to deliver substantial additional benefits over and above just housing growth including business space, environmental benefits, tourism, leisure power solutions, and flood defence.

1.23 GVG is therefore extremely concerned that the proper masterplanning of the town centre and the Area Action Plan for the town centre are not being prioritised alongside the Local Plan and instead being delayed until after potential adoption of what GVG would consider to be inconsistent policies.

1.24 The opportunity to deliver a world class town centre can be achieved but requires a coordinated approach with all interested parties, and in which the GVG Plan can play a part.

Local Plan Consultation 2. Requirements

2.1 Of the 12 Core Planning Principles set out in paragraph 17 of the National Planning Policy Framework (NPPF) the first clearly states that planning should:

Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up to date, and be based on joint working and cooperation to address larger than local issues.

2.2 As a town, Guildford plays a much wider role than just providing for the immediate needs of those in the borough. Its sub regional role means that the future of Guildford town centre will have significant bearing on those living within the much wider sub-regional area. The recent South East Missing Links Study 2016 identified the importance of South East Region towns collaborating over commercial activities to ensure the region continued to prosper as a vital economic engine for the country. Guildford is a key centre in the South East Region.

2.3 GVG has consistently attempted to engage with GBC to bring forward a comprehensive Plan for Guildford town centre which addresses the significant opportunities and constraints currently experienced in the town centre. The previous Allies and Morrison masterplan and updated Town Centre Regeneration Strategy fall significantly short of resolving these issues, even if there was an intention shown to adopt them in policy.

2.4 Paragraph 155 of the NPPF goes on to state that:

Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

2.5 The 17 issues as outlined previously represent the collective vision as set out in para 155 of the NPPF and that GVG consider itself to represent a wide section of the community. GVG has engaged with officers and senior staff within GBC via a series of meetings since its formation. For reasons that are unclear, the council has expressed only cursory interest with the details of the GVG Plan, and has studiously ignored reference to it in any communications and consultations. From 2012 to 2017 the message from the council has consistently been that they have been too busy with Local Plan issues to address the issues around the town centre (which is central to the GBC area!) or make officer time available. Requests for collaboration and further information have been met with indifference over a dozen or so meetings with GBC and no information has been voluntarily supplied. Much of the information which GVG has reviewed has been obtained through Freedom of Information requests. GVG has been frustrated by the non-engagement of GBC. This is in direct contradiction to para 155 of the NPPF which forms a fundamental consideration in the development of the GBC Local Plan.
In examining the Local Plan the appointed inspector will need to consider the conformity with paragraph 182 of the NPPF which states:

The Local Plan will be examined by an independent inspector whose role is to assess whether the Plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a Plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- **Consistent with national policy** – the Plan should enable the delivery of sustainable development in accordance with the policies in the Framework. GVG is pro-growth and recognises and embraces the need for housing

but also considers that Guildford town centre should be regarded as key infrastructure for both the Borough and the wider region. It should be afforded a properly considered place and detailed plan in the Local Plan rather than matters being left to chance and piecemeal development. Delivery of housing in a quality environment should be equally as relevant to plan making.

2.8 It is the opinion of GVG that the proposed Local Plan in its current form cannot be considered as sound and it is with these criteria in mind that this response has been prepared against individual policies contained within the draft Local Plan. Similarly, it is against these same criteria against which the GVG Masterplan has been prepared.

2.9 The council previously undertook a regulation 18 consultation on the Plan in June 2014 to which the GVG provided a detailed response (appendix 5)

2.10 As per the Planning Practice Guidance (PPG) [Paragraph: 017 Reference ID: 12-017-20140306]

Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out specific bodies or persons that a local planning authority must notify and invite representations from in developing its Local Plan. The local planning authority must take into account any representation made, and will need to set out how the main issues raised have been taken into account. It must also consult the Strategic Environmental Assessment consultation bodies on the information and level of detail to include in the sustainability appraisal report.

2.11 Overall, it is considered by GVG that previous consultation responses by it and other interested groups such as the Guildford Society have not been taken into account in the preparation of this regulation 19 draft plan. Accordingly it is considered that the basic conditions of plan making, as set out within regulation and government guidance, have not been complied with and the plan is unsound.

**Statutory Duty to Co-operate**

2.12 The Duty to Cooperate (DTC) Topic Paper which forms part of the evidence base is acknowledged. However there are some shortcomings as to how the council has sought to comply with the DTC as set out in the Localism Act 2011, and amended by the Planning and Compulsory Purchase Act 2004. The DTC is not a duty to agree but the NPPG is clear that local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

2.13 In addition to cooperation with surrounding local planning authorities, other bodies are subject to the DTC as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the National Treatment
2.14 These bodies are:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- the Mayor of London
- the Civil Aviation Authority
- the Homes and Communities Agency
- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail Regulation
- Transport for London
- each Integrated Transport Authority
- each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- the Marine Management Organisation.

2.15 Having reviewed the DTC Topic Paper and the policies contained within the draft Local plan, GVG believes there is a high level of ambiguity and uncertainty around the delivery of infrastructure to support the level of housing allocation and the impact this will have on the traffic in the town centre.

2.16 The Topic Paper references the Local Strategic Statement (LSS) produced by the Surrey Strategic Planning and Infrastructure Partnership. The memorandum of understanding appended to the Topic Paper demonstrates that it has been agreed by all local authorities in Surrey, but there is no reference to Highways England which controls the A3, the principal route through the borough. We presume that it has been removed because GBC has as yet failed to reach agreement with Highways England.

2.17 The PPG also sets out that:

*Close cooperation between district local planning authorities and county councils in 2-tier local planning authority areas will be critical to ensure that both tiers are effective when planning for strategic matters such as minerals, waste, transport and education.*

Paragraph: 014 Reference ID: 9-014-20140306 11

2.18 Communication between GVG and Surrey County Council suggests that this element of the DTC has not been satisfied either, particularly regarding transport infrastructure.

2.19 It is the opinion of GVG that the Statutory Duty to Cooperate has not been complied with and accordingly the draft Local Plan is unsound on this basis alone.
2.20 Irrespective of the DTC having failed, the draft Local Plan has no vision for the town, no plan for delivery, and sets a course for ad hoc development which will frustrate most of the Local Plan objectives as listed.

POLICY S1: Presumption in favour of sustainable development

3.1 As set out in the previous representations, GVG is actively pro-growth and supports well designed development as part of strategic solutions recognising the sub-regional role of Guildford.

3.2 At paragraph 4.1.4 additional text has been added to reasoned justification of policy S1 which suggests that the presumption in favour of sustainable development will not apply to sites listed under footnote 9 of paragraph 14 of the NPPF. This is clearly correct in policy terms but specifically for Guildford this would assume that the council employs a 'brownfield first' approach to achieving housing supply. GVG would agree with this as an approach, but this message is inconsistent in the Local Plan and not reflected in appropriate infrastructure or support.

GBC should be promoting the delivery of suitable brownfield sites early in the Plan process. More recognition is required to the alternative delivery strategies required should the main allocated sites not come forward or delivery rates be slower than anticipated.

3.3 GVG also recognises the historic failures of successive Councils in Guildford to plan proactively and comprehensively over decades. This has led to there being relatively little brownfield land that can be brought forward by the market in such a way as to: A) deliver as much development as it could were it masterplanned; and B) not place such a burden on historically poor and unresolved infrastructure as to constitute sustainable development. For this reason, as much as any other, GVG has been campaigning for proper joined up urban planning to bring about transformation, development and growth in a sustainable way in our core town centre. This approach could equally apply to the outlying residential estates in north-west and north Guildford, where GBC freeholds also predominate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1585  Respondent: 17406209 / Guildford Vision Group (Andrew Black)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2: Planning for the borough - our spatial development strategy

3.4 It is clear from the wording of policy S2 that the housing requirement, in addition to the provision of employment and retail space, has been altered to reflect the change in Plan period from 20 years to 19 years. The rationale for this change remains unclear.

3.5 The proposed submission Local Plan removes Table 1 - Planned Delivery between 2018 and 2033, making it impossible to understand where housing growth will come from to meet the annual housing target as set out in the policy.

3.6 Table 2 which sets out the hierarchy of retail and service centres, has also been deleted from policy S2 which further undermines the commitment of GBC, as a fundamental principle of the Local Plan, to deliver housing in the town centre first.
3.7 It is therefore suggested that the detail on planned delivery and settlement hierarchy is reintroduced into the final version of the plan to ensure it is clearer on where growth is coming from and the rate of delivery for the borough.

Conclusion

5.1 Guildford Vision Group remains committed to seeing the Borough of Guildford, and particularly Guildford town centre, become a better place. This requires focused attention of providing for high quality growth of housing, commercial space, together with supporting community and infrastructure assets over the next 20 years to cope with the current deficits and predicted increase in population in the borough over this period.

5.2 The historical core of Guildford is afforded a high degree of statutory protection but has a very limited mix of uses, either at present or as promoted under the Plan. The GVG Plan looks to the end of the draft plan period and the next and reimagines Guildford in providing a broad mix of higher density, mixed use development while also delivering a range of key environmental improvements. This will include improvements in retail dwell times, better leisure, business, civic, health and other provision. A more organised transport solution giving access to all forms of transport should achieve much greater modal shift. The historic core would remain protected and unchanged.

5.3 The particular focus of GVG is to see a robust and deliverable masterplan come forward for Guildford town centre which gives confidence to developers to deliver the project. Such a masterplan can achieve the objectives of the group as set out previously in this consultation response. It can meet the 17 issues as identified by GVG that are not addressed by the Local Plan in any credible way.

5.4 A vital element of any masterplan for the town centre is to resolve the existing chronic issues - traffic congestion, record vehicle-related fatalities and serious injury as well as record pollution. The congestion issues will continue to increase. If the proposed increase in homes across the borough is brought forward as set out in the draft plan then the existing failing infrastructure within the town centre will collapse completely.

5.5 GVG does not believe it can solve the traffic problem. The GVG Plan is to protect the existing accessibility and capacity of the town centre and to remove the current conflict between vehicles and people within the town centre. It employs better and safer designed roads, cycle routes and footpaths in an integrated, modal shift-enabled plan addressing the first five of the 17 issues identified by the group.

5.6 A central feature of the GVG Masterplan is the delivery of a new East-West crossing, linking York Road with Guildford Park Road. This will move traffic away from the centre. It will enable separation of cars from people and cyclists. It will make Bridge Street and Onslow St safer and free from through traffic-free, except for buses, taxis, permitted vehicles and mobility access. It will enable the lower ends of both North St and the High St to be linked together by great public space and amenities along the both sides of the riverside.

5.7 The plans suggested by GVG has genuine support from the local community, demonstrated at several public events and on social media. Unfortunately GBC have had limited, engagement with the group, failed to discuss details or to answer its technical questions as a local stakeholder in the Plan making process.

5.8 It is the firm intention of GVG to have its evolving Plan considered and it will continue to make representations to the borough as part of the Local Plan examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Guildford Vision Group Reps - final version 20.07.17 (2).pdf (1.3 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in homes, the surrounding infrastructure and amenities available to existing residents of Send and Ripley is inadequate already, not to mention the current traffic congestion and condition of roads - the lack of council support for the conditions of these to be renewed, of which increase resulting traffic and car numbers from this increase in dwellings, will exacerbate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3325  Respondent: 17407681 / James Scrace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in designation of these sites to "Travellers" plots and industrial floorspace. The need for increased Traveller plot numbers is not proven nor is the position and location of the site suitable. This is adjacent to an already very busy, traffic-accident and traffic congestion-prone road and and circa 400 new homes/plots and the associated car/ caravan numbers entering and exiting the site will exacerbate this further. As per my objection on A42, this too will place a great strain on an already very residentially dense area of the borough and exacerbate the underprovision of local amenities and infrastructure. This coupled with the new industrial floorspace and increase numbers of lorries and industrial related vehicle traffic, plus the proposed junction onto the A3 at Burntcommon, risks increased further congestion to an already traffficjam heavy blackspot for the A3 interchange with M25 at Ripley. This has repercussions to increase car numbers and Gridlock through Ripley village which is damaging to the qualities that make the Village a desirable place to live, plus the increased pollution and damage to air quality.

Existing local schools, doctors surgeries and shops will not be able to cope with this added influx of residents. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] considering the encroachment of the Greenbelt already planned for this area of Send and Ripley, and risks placing the existing natural ecosystem and habitats of wild birds and animals, not to mention the historic importance of these ancient woodlands at Garlicks Arch, at great risk of damage and extinction.

In summary, these proposals are unsuitable and the needs not proven considering the other available sites (including available brownfield sites) where these particular plots and industrial provision would be much better suited - why place a new industrial park so far away from the existing one at Slyfield when there is space closer to Slyfield site to develop instead - this seems a huge oversight and makes little sense from a perspective of logistics and efficiency for the operation of the industrial processes at these two sites. The increase in Traveller plot numbers and their proposed position in Send and Ripley really places existing infrastructure and amenities at great strain and risks damaging the demographic balance and quality of the built and natural environment which make this area of Guildford, and indeed Surrey, a desirable place to live for not only existing residents, but for those looking to move to the Borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5102  
Respondent: 17407745 / Lilijana Howells  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of sites A4, Telephone Exchange and A18, Guildford College as they would provide 200 homes in sustainable location, and 100 homes at A33, Broadford Business Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3334  
Respondent: 17407745 / Lilijana Howells  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of this site from Green Belt. It was included at the last minute in the 2016 draft, without justification other than the proposed A3 slip roads.

I object to the proposal of travelling showmen as Ripley already has 4 travellers pitches, with more are proposed on site A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3336  
Respondent: 17407745 / Lilijana Howells  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing site A46, 1100 homes, from the draft Plan. Like Wisley it is located in Green Belt but unlike Wisley, it is close to a railway station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3337  Respondent: 17407745 / Lilijana Howells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to a site providing 5 houses being excluded from the current draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3338  Respondent: 17407745 / Lilijana Howells  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this site being included as well as Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1617  Respondent: 17407745 / Lilijana Howells  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
</tr>
<tr>
<td>I object to the GBC not adhering to NPPF rules - “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” (NPPF Section 9, paragraph 79).</td>
</tr>
<tr>
<td>I object to the extension of site A35 (former Wisley Airfield) and its proposed removal from the Green Belt as it is in the centre of the Metropolitan Green Belt, surrounded by countryside.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1616  Respondent: 17407745 / Lilijana Howells  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
</tr>
<tr>
<td>I object to GBC using amended housing figures (SHMA) based on a flawed housing study which has attracted widespread criticism.</td>
</tr>
<tr>
<td>I object to GBC making amendments without adhering to the government’s NPPF rules “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. (NPPF, Section 9, para 80).</td>
</tr>
<tr>
<td>I object that the amended draft does not encouraging utilising the numerous surface public car parks in to provide sustainable homes.</td>
</tr>
<tr>
<td>I object to the amended plan ignoring the government’s NPPF guidelines - “...... local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”</td>
</tr>
<tr>
<td>I object to GBC amending all of the large Green Belt sites and including large Green Belt sites throughout the borough for housing instead of proposing housing in every village and town, on a proportional basis, to meet local needs.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

| Comment ID: pslp172/3339  Respondent: 17407777 / Rachel McDonald  Agent: |
As previously set out, I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site because of the constraints on the site and the physical location.
2. Too far from railway stations.
3. Limited footpaths and safe walking or cycling routes.
4. Located next to and close to very congested motorway M25 and A road A3 which are frequently at grid lock throughout the day.
5. Local roads and back roads are not safe alternatives to blocked motorways and are very busy normally which has lead to consistent accidents due to dangerous black spots (Black Swan junction).
6. Train services already to congested and limited parking.
7. Local roads not safe for bus services, cars, cycles and walking commuters. Unrealistic.
8. RHS Wisley is near to this site and during shows causes increased traffic congestion and incidents.
9. Limited employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. I object to the negative impact to heritage sites.
11. remove this site from the local plan.
12. I object to this development because it will not improve the dangerously high pollution levels in this area.
13. I object because the plans includes a new road for the Elm Corner residents which involves having to navigate our way through the new development particularly when there is a better alternative for the residents available to the Council.
14. I object to the proposed Submission Local Plan.
15. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
16. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
17. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
18. I object to the extension of the plan period by 1 year as it has not been identified as a major change
19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
20. I object to the Council wasting tax payers and residents’ time and money by not following due process and ignoring previous representations.
21. I object to the 10% buffer in the housing number over the plan period.
22. I object to the evidence base which is not transparent and has been challenged.
23. I object to the transport evidence base including the Highways assessment report.
24. I object to the transport assessment which used prescribed vehicle movements from this site with no justification.
25. I object to the housing number, particularly as the Council have not, as required used any constraints such as green belt, infrastructure, air quality. I believe that the housing number is unsound and unnecessary as housing shortage is not in Surrey but in inner London where low paid workers need to live to be near to their work.
26. I object to the apparent disregard the damage caused by nitrogen deposition and high pollution levels.
27. I object to policy S2 because the figures in the AHT table do not add up.
28. I object to the quantity of space allocated for retail in the town centre.
29. I object because the schooling offered is inadequate for this area both pre-school, primary, Junior and High school. Not enough thought has been given to the future need.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/1619  Respondent: 17407969 / Jason and Caroline Brennan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the proposed plans Inviewoflawednewevidence,Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1621  Respondent: 17408033 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes to Policy P2 Green Belt because they have not addressed many of the 32,000 comments made to the 2016 plan. Policy P2 fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check unrestricted sprawl of built-up areas, to prevent neighbouring towns from merging into one another, to safeguard the countryside from encroachment, to preserve the setting and special character of historic towns, and to assist with urban regeneration by encouraging the recycling of derelict and other urban land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1622  Respondent: 17408033 / Julie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
I object to the removal from the green belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site because this could enable development within these areas at much higher density and will give greater success for planning applications. Currently these areas contribute to the openness of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to this proposal as anyone who lives in Send who uses Tannery Lane knows the small rural lane is utterly unsuitable for further developments to take place, turning into Send Road from Tannery takes an age and is difficult to exit to Send Road. You have already allowed, despite objections which I assume were again just ignored, a marina no one wanted and which we all knew was a precursor to further development requests. Not only have we been ignored but you have this time decided to INCREASE the number of houses for the site by 30 odd%. The impact on traffic, the green belt, amenities and the area itself makes this a completely wrong.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to this proposal as anyone who lives in Send who uses Tannery Lane knows the small rural lane is utterly unsuitable for further developments to take place, turning into Send Road from Tannery takes an age and is difficult to exit to Send Road. You have already allowed, despite objections which I assume were again just ignored, a marina no one wanted and which we all knew was a precursor to further development requests. Not only have we been ignored but you have this time decided to INCREASE the number of houses for the site by 30 odd%. The impact on traffic, the green belt, amenities and the area itself makes this a completely wrong.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I simply don't understand how the protection of green belt in this manner can be allowed. What possible exceptional circumstances can be shown to make this acceptable. The inclusion now of pitches for "travelling show people" despite the thousands of objections you have received as by suggesting there is a need for travelling show people pitches is cynical use of a minority, by suggesting such a need even exists. You should be ashamed at your blatant attempt to bypass the protection of a lovely area to get your way and build some 400 homes to meet some central government quota which takes NO consideration of impact. This is unacceptable and should not proceed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3360</th>
<th>Respondent: 17408065 / Daphne Hollett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this being brought back, bigger and more than even before, despite the huge volume of objections which led it to be removed previously. Its been brought back as a minimum of 7000 sq m of warehousing and appears to show utter disregard for the unnecessary damage to the green belt (which I believed was protected but which the GBC seem to feel is just protected in the past now and future generations will simply be deprived of if GBC don't step up and take better protection for it. Why is this even on here? I presume as a concession, of the line of "Lets add something back in which we had a load of objections to before and removed. When these people complain again we will concede and let this unnecessary one go, and they will take the other ridiculous plans getting rubber-stamped better", GBC need to remove this plan once and for all. The 2017 Employment Land Need Assessment shows less of this type of property is needed and Slyfield has land and vacant buildings to accommodate such a need, if one even appears! Stop causing upset and concern for Send and surrounding villages and accept this is not needed, impacts the locals and the environment/green belt and is not even needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1624</th>
<th>Respondent: 17408065 / Daphne Hollett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I Object to the proposal to inset Send Business Park from the Green Belt. It's in the greenbelt, clear and simple. Coming up with ways for villages and all to meet some quota GBC should be defending us from this short sighted approach, protecting the green belt for us and for future generations and standing up for us. I am not sure how many times we can say that Tannery Lane is a small rural lane with poor access and it simply cannot accommodate more traffic. Send and surrounding villages deal with a lot of traffic and to suggest adding more by finding a way to get this out of the greenbelt (despite the fact its clearly within and surrounded by greenbelt) is unacceptable. Its the thin edge of the wedge and you know it... you start with this and then it simply opens up the option for further development. GBC needs to stop any more intrusion or impact to the greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3365  Respondent: 17408225 / Jill and Arthur Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn in Tannery Lane because it is a far greater development than was originally planned. It arrogantly ignores all the previous objections and will make traffic movement in Send absolutely impossible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3366  Respondent: 17408225 / Jill and Arthur Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 change at Garlick's Arch because I am not convinced there is a need for any Travelling Showpeople plots in this area. The number of new houses planned is EXCESSIVE and it is IN THE GREEN BELT. Again, it will cause more traffic problems in the area than there are already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3368  Respondent: 17408225 / Jill and Arthur Thomas  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58, Burnt Common, London Road because I don't believe there is a need for more industrial development here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1626  Respondent: 17408225 / Jill and Arthur Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because it goes against what the Green Belt means and will spoil the beautiful area of the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3369  Respondent: 17408289 / Kate Young  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9] on the basis that it:

A) disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]

B) directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas.
C) ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

D) adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3380  **Respondent:** 17408321 / Graham Legge  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Clockbarn Nursery, Tannery Lane, Policy A42**

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It ignores all the hundred of previous objections made by local people
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will cause erosion of the Green Belt in our village
- It will increase surface water flooding, which is already a problem and is increasing with further development
- It will impact on the open countryside views from the River Wey Navigation

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3381  **Respondent:** 17408321 / Graham Legge  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Land at Garlik’s Arch, Send Marsh, Policy A43**

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- The is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no ‘exception circumstances’ exist
- It will cause overdevelopment of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join p Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3382</th>
<th>Respondent: 17408321 / Graham Legge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Land at Burn Common, London Road, Policy A58**

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1630</th>
<th>Respondent: 17408321 / Graham Legge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Green Belt, Policy 2 at paragraph 4.3.15

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3383  Respondent: 17408385 / Jon Cooling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane. To increase the number of houses from 45 to 60 as this will worsen traffic problems in Tannery Lane and at the A247 junction. This will have a knock-on effect to pollution in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3384  Respondent: 17408385 / Jon Cooling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch. There have already been thousands of previous objections made by local people opposed to this plan. To date there has been no proven demand for Travelling Showpeople plots in this location so why should we cater for this? This is a stunning Green Belt area that we should protect and not build upon. This area is subject to frequent flooding and should not be built upon. Considering the amount of waster that travellers left in Bromley recently, as highlighted in Sunday newspapers, there are obvious concerns over the impacts on the local area and the costs to local people.
The increase in residential houses will put a strain on the Village Medical Centre and the school, which are already over subscribed. With reported cuts in school budgets, how are such services expected to maintain quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3385  Respondent: 17408385 / Jon Cooling  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common. Notably it was deleted from the 2014 draft because of all the objections made previously. There is no need to build an industrial/warehouse development in the middle of the Green Belt when other places such as Slyfield and Guildford still have empty sites and industrial units.

I object to the proposal to inset Send Business Park from the Green Belt. It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation. Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3386  Respondent: 17408481 / Colin Brewer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is further from railway stations than any other identified strategic site.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
3. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is further from railway stations than any other identified strategic site.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
3. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- The evidence base is unsound, out of date and inconsistent. Particularly the SHMA, (2017 Guildford Update), the ELNA, the SHAR, the Green Belt and Countryside Study, and the Air Quality review.
  
  • there is no comprehensive list of the evidence base making it impossible to know what the Council relies upon.
  • it is littered with basic errors, including simple mathematical errors.
  • the drafting is weak and unenforceable.
  • there is no justification for including TFM (site A35) due to sustainability, air quality, impact on the TBHSPA, green belt, infrastructure cost.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/302</th>
<th>Respondent:</th>
<th>17408545 / Helen Craig</th>
<th>Agent:</th>
</tr>
</thead>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

In addition specifically relating to The consultation on the Guildford Borough Council proposed Submission Plan under Regulation 19

- the evidence base is unsound, out of date and inconsistent. Particularly the SHMA, (2017 Guildford Update), the ELNA, the SHAR, the Green Belt and Countryside Study, and the Air Quality review.
- there is no comprehensive list of the evidence base making it impossible to know what the Council relies upon.
- it is littered with basic errors, including simple mathematical errors.
- the drafting is weak and unenforceable.
- there is no justification for including TFM (site A35) due to sustainability, air quality, impact on the TBHSPA, green belt, infrastructure cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17l/1641</th>
<th>Respondent:</th>
<th>17408865 / Jessica Ferguson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy E6</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6

5. The ‘Summary of Key Changes to the Proposed Submission Local Plan’ states in respect of Policy E6 that changes are made to create “…increased flexibility in terms of locational requirements for self-contained hotels.” However, no substantive change has been made to the policy to achieve this. Rather, changes to the policy and supporting text relate primarily to ensuring that new leisure and visitor experience development preserves the local landscape and heritage assets.
6. There is clear recognition that many of the Borough’s leisure and cultural visitor attractions are rural. Indeed, part (1)(c) of the Policy supports “sustainable rural tourism and leisure developments that benefit businesses, communities and visitors in rural areas” as long as they meet certain criteria. However, new accommodation and conference facilities in these locations could be stymied by the need to comply with the sequential test (ie, as required by part (1)(b), despite there being local demand arising from those leisure and cultural visitor attractions themselves.

7. Greater flexibility (or at the very least, improved guidance) is required in respect of the sequential test relating to rural leisure and visitor facilities so that needs can be met in situ and unsustainable behaviour avoided. Indeed, the NPPG recognises that in some situations, the sequential test may result in undesirable outcomes by failing to recognise the specific market and locational requirements of certain main town centre uses, as defined at Annex 2 of the NPPF.

8. In respect of part (2), a clear definition of “proposals for new leisure space….” is required so that promoters understand whether their particular proposal will be subjected to an impact test. Otherwise, the policies is imprecise.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1639  Respondent: 17408865 / Jessica Ferguson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2
1. The changes to Policy P2 are inconsistent with national policy, primarily the exceptions set out at Paragraph 89 of the NPPF.

2. Whilst part (2) of the policy confirms that certain proposals are not considered inappropriate development as defined by national policy (eg, mineral extraction, engineering operations, etc), there are other types of proposal which, whilst continuing to be ‘inappropriate development’ benefit from a number of policy exceptions. This distinction is corrupted by the drafting through the words “…also meet the following criteria” at the end of part (2) of the policy, which has the effect of wrongly blending exceptions relating to appropriate and inappropriate development.

3. Whilst the policy presently includes ‘Limited infilling’, the drafting effectively reduces the scope of national policy by failing to make explicit that this includes “partial or complete redevelopment of previously developed sites” and the particular criteria attached to this (ie, no greater impact on openness, etc). The policy also omits, without explanation, the provision of facilities for sport and outdoor recreation in the Green Belt. It is not enough to say these are supported by national policy because of the error at part (2), as explained above.

4. The Council is respectfully asked to reconsider its policy following forensic reading and understanding of national policy relating to the control of development in the Green Belt, to ensure that support for proposals in the Green Belt which benefit from exceptions in national policy are not prejudiced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The proposed 1750 new homes are far too many properties for the area to absorb and will result in the coalescence of the villages which seek to keep their own characteristics and individualism. Further development in Ash Green must protect the historic value to the area. Of particular importance is Ash Manor and the buildings in close proximity to it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Ash Green is NOT part of the Ash & Tongham Urban Area. The ATUA must therefore not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Councils changes to the draft local plan and the inclusion of Blackwell Farm as a development site (policy A26 & para, 4.1.9) which Disregards an independent expert landscape study, which demonstrates that part of the site merits Area of outstanding natural beauty status following natural England's forthcoming boundary review (para 4.3.8) Directs more office space to an extended business park (policy E4) which will increase peak time congestion particularly around the hospital and A&E and will encourage rat running through residential areas Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and questions the viability of the development (2.14a) Adds to pollution in neighbouring areas, which already exceeds safe EU limits for nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4796  Respondent: 17411617 / Graham James Whitehead  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."
• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

a) The Street in Tongham  
b) A331/A323 intersection  
c) A31 /White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

**Attached documents:**

**Comment ID:** pslp171/3206  **Respondent:** 17411617 / Graham James Whitehead  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Policy P3 - Countryside

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

• 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My greatest underlying concern and objection remain: that the figures for the calculation of the number of new houses required, taken from the SHMA, are seriously flawed. Based on doubtful forecasts the initial figure has now been increased to 654 houses pa - an overall increase of 22% in building stock and double the ONS projection for the same period of 10.4%

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1646  Respondent: 17411937 / Martin Druce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The GBC local plan is not fit for purpose - it continues to ignore the formally expressed opinions of the vast majority of its constituents, it continues to fail to justify some totally un-businesslike assumptions, it continues to work to flawed demand projections and again fails to justify its intransigence, it refuses to debate critical green belt issues and is clearly signalling easy greenbelt pickings to developers.

Why would you ignore public opinion in this way - do you really think you know better? A look at Guildford’s planning history over the last 50 years and the current dire state of the town clearly shows that we have been continually let down by your so-called planning experts.

To insist on limiting responses to changes to the document is in itself non-democratic, and controlling - creating suspicion that you are hell-bent on getting your way regardless and are trying tio suppress any kind of debate. It has all the hallmarks of a ‘fix’ and I formally object to GBC behaviour and the changes to the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/436  Respondent: 17412193 / Beryl Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ripley
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to strongly object to the Guildford Borough Proposed Submission Local Plan (June 2017), particularly in respect of the changes affecting my village (Ripley) and neighbouring Send. The proposed submission makes the Plan even worse than the 2016 proposals.

My reasons for objecting relate to the damaging impact of proposals and the apparent disregard of the ‘brownfield first’ policy by Guildford Borough Council (GBC).

In particular:

**I object to the unfair imbalance of the Plan across the borough.**

With the removal of site A46 from the Plan (with its proposed 1,100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough, the Plan has become even more biased against the North East of the borough. Guildford Borough is an area of more than 100 square miles. Of the 11,350 homes proposed in the Plan, 40.6 per cent (4,613) are within three miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

**I object to the hiding of development by ‘deferment’ (A24, A25, A26, A43)**

This version of the Plan has concealed some development planned to take place by ‘deferring’ it beyond the period covered by the Local Plan. This has two effects:

1. i) to hide the number of housed actually being built (A24, A25, A26 – total of 1,100 deferred, but still being built), and
2. ii) to give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

**I object to the lack of proper infrastructure planning for sites (A43 and A42)**

The Foreword to the plan by Paul Spooner includes on page 5:

“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object removing Send Business Park from the Green Belt (4.3.15).

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF, can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---
Site A4 has been removed. This is within the town centre and therefore with sustainable infrastructure and would make use of a brownfield site in need of redevelopment. The Plan has removed housing from the site in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is an unacceptable trade off.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3417  Respondent: 17412193 / Beryl Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3419  Respondent: 17412193 / Beryl Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlicks Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of six Travelling Showpeople sites in A34 Garlicks Arch

The allocation of six Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch.
as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlicks Arch

The potential of an increase from 400 houses at site A43 Garlicks Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3420  Respondent: 17412193 / Beryl Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burnt Common, removes the need for A43 Garlicks Arch

GBC’s own reasons for including Garlicks Arch A43 in the 2016 version were:

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ...(site allocation A25) [ than the Burnt Common site did ]
2. The site [A43] provides the employment floor space needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlicks Arch to be included.

I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1648  Respondent: 17412193 / Beryl Evans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”. The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t have to provide any ‘affordable’ homes - just make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [ie a reason for not delivering affordable houses]. That has now been removed, thereby implying that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is shocking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3418  Respondent: 17412385 / Geoffrey Mayne  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The documents imply that there is a reduction to 1,700 new homes (from the earlier figure of 2,000. But it now appears this is misleading and that the lower figure is still a minimum. In any event, this scale of new homes planned is, in my opinion, so large as to inevitably damage the whole infrastructure of the area.

Infrastructure: The proposed changes to the access to the A3, together with other recent and proposed road system changes will, in my opinion, have such a large negative impact on Burpham as to inevitably cause major traffic disruptions and should be entirely reconsidered.

The proposed development will generate a daily movement of thousands of vehicles the vast majority of which will pass through Burpham. This Plan represents yet another ill-conceived planning proposal, with insufficient thought given to the infrastructure needed.

The last few decades have seen two major housing estates, a considerable number of smaller garden grabbing developments, one super store and, recently, one very inappropriately sited supermarket. Both because of the volume and reduced speed of traffic, these changes regularly lead to severe air pollution which damages the quality of our lives in Burpham. The current Plan represents a major worsening in an already unacceptable traffic and pollution situation.

Access to the development:
Access/egress to and from the proposed development is shown from one roundabout, serving traffic from the A3 and the A3100 which, in my opinion, is unacceptable owing to the risk of grid-lock. The whole matter of access (as well as scale) needs to be reconsidered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

The housing need has been reduced from 693 per annum last year to 653 per annum, giving a total build over the period of the Plan of 13,893. On the one hand, a reduction of around 5% has minimal impact on my own concerns about the scale of the housing development’s enormous and negative impact on the Borough as a whole. Equally, I now understand that an over-inflated housing need figure has been used in the Plan. As this affects every aspect of this Draft Local Plan; this one particular renders the whole Plan unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I wish to support the letter sent in response to the draft local plan by the Burpham Community Association. I would also like to comment on the differing figures that has been added regarding the number of homes that will be required and there appears to be mistakes made in calculating these. Bearing in mind that any homes built on green belt land, by definition, around Guildford are never going to be affordable due to current land costs, so brown field site should be used first and reserved for social and affordable housing. Also I would like to have seen more support for infrastructure improvements before any development is allowed, with air pollution control oven priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp173/442  Respondent: 17412769 / Pauline Levy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removal of site A46 - 1,100 homes and school (land to the south of Normandy and north of Flexford)

Removal of site A47 - 50 homes (land to the east of the Paddock, Flexford)

Wish to support removal of these sites due to the possible pressure on the infrastructure, i.e. roads and other amenities. Change in status of homes in that area from Green Belt and the effect of the appearance of the open countryside of this area. Can we afford to put further stress on these facilities!

To increase the impending possibility of further development in the general area would put intolerable density on the Guildford Road which is already an unpleasant necessity and surely detrimental to mental wellbeing and physical health. At a time when the general feeling is beginning to give more weight to these subjects and to learn that these effects are costly to the nation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/443  Respondent: 17412801 / John Thornton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have reviewed the limited amendments proposed to the Local Plan and I maintain my objection to the plan - particularly as it impacts on East Horsley.

The level of development still proposed would be too much for the already over stretched local facilities.

The plans mean an unacceptable weakening of our respect for the green belt and the advantages it brings to all.

Within this plan the unbelievably unrealistic plans to create a new town on the old airfield at Wisley must be ruled out again. The facilities in the area including roads and public transport simply could not cope with this level of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp173/445</th>
<th>Respondent: 17412961 / Sandra Marshall</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I fully appreciate the necessity for building new houses particularly affordable ones and am in favour of small developments distributed fairly over the county. However I object to the numbers proposed for Normandy, Ash and the addition of Blackwell Farm. The inability of local roads to be able to cope with the increase in traffic and the resulting pollution threatening young children and those in frail health would be a daily hazard to local residents and would further exceed safe EU limits for Nitrous Oxide. In addition we would need further parking at Ash and Normandy railway stations for which there is no facility to expand. As a result there would be an explosion of anti-social street parking. I object to the threat to the Hogs Back area which has been designated an area of Outstanding Natural Beauty and the jeopardy to the Green Belt by this latest Guildford Plan and the danger of urban sprawl from Guilford to Normandy and beyond. What changes (2016)/further amendments (2017) do you suggest should be made to the document? Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp173/448</th>
<th>Respondent: 17413025 / Sally Novell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the proposal to inset Send Business Park from the Green Belt because:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• There is highly restricted vehicular access along Tannery Lane in both directions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: pslp172/3440</td>
<td>Respondent: 17413025 / Sally Novell</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-----------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to Policy A25 change re Gosden Hill Farm. Even though housing numbers at this site seem to have been revised slightly downward to 1700 from 2000, the wording in Policy A25 now states ‘Approximately 2,000 homes of which a minimum of 1,700 homes will be delivered within the plan period’. This seems to be suggesting a change which in reality may not exist, and is misleading.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3442</th>
<th>Respondent: 17413025 / Sally Novell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to site A35 change re at Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which will result in the loss of more open countryside to development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3443</th>
<th>Respondent: 17413025 / Sally Novell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It ignores the hundreds of previous objections made by local people
- The increase to 60 homes in place of 45 homes is 33% more and too much
- It will exacerbate the erosion of the green belt
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3444</th>
<th>Respondent: 17413025 / Sally Novell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of the village and the number of homes is excessive
- It will join up Ripley and Send and defeat the key purpose of the Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It will generate excessive traffic that will block up the local roads of Send and Ripley and the A3 which is already subject to severe congestion

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3445</th>
<th>Respondent: 17413025 / Sally Novell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the key purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1666  Respondent: 17413025 / Sally Novell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan and remain too high as shown by an objective assessment made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser).
2. Also in Policy S2 I object to the fact that downward economic pressures (including Brexit) have not been adequately accounted for. Additionally in Policy E1 and E2 there is too much emphasis on providing retail and commercial use in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.
3. I object to the population growth figures in section 2.3, which have increased by almost 5000 and do not account for more recent political and economic changes.
4. I object to Policy S2 because the figures include estimated demand from London, rather than meeting the needs of residents of Guildford Borough.
5. I object to the fact that in Policy S2, the impact on the east of the borough is still disproportionate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3446  Respondent: 17413153 / Grahame Bunce  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
I write to record my objection to the inclusion of Blackwell Farm as a development site in the revised draft Local Plan. This is an area where my wife and I walk on a regular basis and the proposals will negatively affect the area as follows:

i) There will be additional congestion particularly at peak time around the hospital and beyond. Until recently I worked at the Surrey Research Park and although the introduction of the traffic lights improved the situation it is still congested on a regular basis and this development will add significantly to the problem.

ii) The traffic will add to an existing issue with air pollution in the area.

iii) There is a strong argument that part of the area should have already been categorised as an Area of Outstanding Beauty. This development appears to be totally ignoring this

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3457  Respondent: 17413729 / Katherine Pound  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) I OBJECT TO POLICY A42 because it is unacceptable to increase the number of proposed houses when so many objections were raised to the original suggestion of 45 houses. When there were serious concerns raised over flooding and the detrimental impact on the countryside of building 45 houses, it is even more ridiculous to suggest building 60 houses. There are already significant traffic issues along Tannery Lane and building anymore houses will significantly worsen this. There is no excuse to erode the Green Belt and destroy the countryside in such a drastic manner.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3460  Respondent: 17413729 / Katherine Pound  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I OBJECT TO POLICY A58 as this has already been objected to and removed from the 2014 Local Plan, and nothing has since changed to justify this building in the middle of the Green Belt, not least when there are vacant sites at Slyfield and Guildford industrial parks. In particular the 2017 Employment Land Need Assessment shows the demand for industrial land in the borough is only 3.9 hectares, so it is beyond ridiculous to suggest creating 10 hectares in the middle of Send, especially in the Green Belt, which will cause gridlock in small surrounding roads. It is further incredibly deceptive to change the wording of this policy from maximum to minimum of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1684  Respondent: 17413729 / Katherine Pound  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) I OBJECT TO POLICY 2, PARAGRAPH 4.3.15, the proposal to remove Send Business Park from the Green Belt because the site is totally unsuitable for further expansion. The area around the Business Park is beautiful open countryside next to the Wey Navigation, and under no circumstances should be ruined by expanding a business site - if necessary business expansion should be on brownfield sites. The purpose of Green Belt is to protect areas of green open countryside that could otherwise be overlooked, built on and lost to society forever and there is NEVER a reason to retrospectively remove Green Belt. In addition, there is very limited vehicular access to the site from either direction and the increase in volume of traffic that would necessarily result from expanding the site would cause jams and possibly even accidents. At a minimum this would increase pollution and disrupt the peace and tranquillity of the local environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1697  Respondent: 17414177 / Ruth Phillips  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The removal of sites A46 and A47 from the 2016 plan meets with our support.

However, we object to the insetting in the Greenbelt as part of the proposed Greenbelt boundary changes as there are no exceptional circumstances which would justify such insetting. This objection includes a further insetting of areas within Normandy and Flexford and of sites A49 and A50.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3473  Respondent: 17414241 / Lavinia Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes relating to policy A43 Garlick’s Arch because:
- Again you have ignored the thousands of previous objections.
- There are no ‘exceptional circumstances’ required to develop on this Green belt.
- It will generate excessive traffic along the Clandon Road with associated noise and light pollution. This will be made even worse if the adjoining Policy A58 is implemented.
- It would appear that there is no demand for Travelling Show people plots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3472  Respondent: 17414241 / Lavinia Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes relating to Policy A58 Burnt Common because
- This Policy was deleted from the 2014 Plan following previous objections.
- Additionally, I see the Plan now references ‘Minimum’ rather than the original ‘Maximum’ referring to the 7,000 sq feet of industrial or warehousing. If the original proposal was deleted again, I see no reason why the changed plan actually increases the proposed level of development.
- The impact on the Clandon Road and adjoining roads will create huge traffic issues, and noise and light pollution issues.
- There is no need to develop on this section of Green Belt land when other local sites including Slyfield and Guildford have empty existing sites and ‘brown field’ sites amiable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp17q/315  Respondent: 17414241 / Lavinia Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of Clandon Road, Burnt Common I find it incredible that GBC have failed to listen to the residents of Send and Burnt Common who previously in force have objected to the proposed Local Plan. Instead you seem to have made further changes that result in more development rather than less, failing in the duty of GBC to listen to residents.

It seems that you are simply ‘testing’ the patience of residents by repeatedly making further changes without realising that your proposals are completely unacceptable. It is unjust that you are focussing a disproportionate level of development in and around the Burnt Common and Send compared with our areas of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3479  Respondent: 17414529 / Graham Davies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to Policy A26 (Blackwell Farm) on the grounds below

Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1. It disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8] 2. It directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas.

2. It ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a] 4. It adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/454  Respondent: 17414561 / Elliot Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to strongly, wholeheartedly object to the ridiculous and unnecessary plans for construction in and around the Send area. I am limited only in objecting to the latest changes to the proposals but I will include my arguments against the entire campaign to construct in and around our town as part of the GBC Local Plan. I hope you will take my voice into consideration.

Firstly, there is overwhelmingly little support for such plans, local opinion suggest that they didn't want, or were not supportive of, any more construction around the Guildford Borough area. The fact that we, as a community of your constituents, have rejected plan after plan should be more than enough of an indication that we do not want any more housing construction here. Hundreds of us have objected dozens of times to more construction, do you respect us or our views at all? I will state this directly, how is it that hard a concept to grasp?: We don't want any more houses here. I object to any and all plans or changes to plans in regards to construction in Send.

Secondly, the stress that new people and their families will bring to the infrastructure and public services has not been even mildly considered by Guildford Borough Council. It is within the boundaries of the law to reconsider construction, or any changes to plans, when infrastructure is inadequate. The small roads in and around Send are already jam packed with traffic, imagine the increase in issues we will have if more families arrive. Traffic problems along Send Road, Tannery Lane, the A247 junction and the roundabout at Burnt Common are already unbearable enough as they are. Let's theorise an average and say each family consists of two parents and two children. That's already two cars when the children are young but that will increase to three or four when they are teenagers. So for the 500 or more houses that are being suggested that's at least a thousand additional cars on an already over filled road system. I take the 462/3 bus to Guildford for work every morning, it is already incredibly behind schedule during present traffic conditions, this will only worsen as more houses arrive. The drivers should not face the wrath of another angry letter writer (like me) because of the shortsightedness of the council. Road works, of which there is plenty of (and I am genuinely grateful for the work and effort that goes into the road improvements) will only compound this issue even further.

Our water and sewage systems will also be affected, our already intensely overfilled and last remaining school, Send First, will be overfilled even more, and our sole doctors surgery will be overworked with the arrival with several thousand more patients. We also share much of our infrastructure with our neighbours in Woking, how will this be affected? Actually, has any sort of investigation into whether the infrastructure of the surrounding area can take the plans in Send been initiated or even been considered by Guildford Borough Council? It certainly doesn't feel like it.

Thirdly, the environmental impact of these plans would be devastating to the local wildlife and scenery. This foolhardy crusade to construct as many houses as possible in our tiny community has completely ignored the fact that this is the Green Belt, which is supposedly not meant to be constructed on. We chose to live here because we do not want to live in a city or an over-urbanised area, Guildford Borough Council seems intent on denying us this and assimilating Send and Ripley into the surrounding cities. The plans that you are forcing upon us are not justified under the Green Belt policies. I
will use two of the more outrageous plans, but make no mistake I and our entire village, objects to all of these and the additional plans. In Garlicks Arch, an area of ancient woodland that has been spared from construction by law since Elizabeth I, you are suggesting construction. This is wrong. How does this justify as "exceptional circumstances in Green Belt policy? Destroying an ancient and beautiful area of forest to build 400 homes and some travellers sites is unthinkably, unfathomably stupid. Guildford Borough Council is also forcing upon us plans, and changes to plans, to construct warehouses and industrial units in Green Belt land. There is no local demand for these and there is actually a decline in demand for industrial land, so much so that there are empty sites in nearby Guildford and Slyfield. Repurpose those, don't shove them in here just to save a few pounds. Fitting in the "minimum" 7000 square metres of industrial shows how little the Borough Council understands about industry, our views and their lack of care about the environment in an age of unbelievable environmental stupidity. Prove us wrong and scrap these plans.

Fourthly, the fact that this is clearly a cash grab for the wealthy housing businesses already bloated on overcharged rates and prices for housing. The fact that these houses are being constructed for private sale, not social housing, makes the prospect that they are for the purposes of affordable housing and relieving pressure on the market absurd. We would object to social housing regardless but this push for yet more private housing utterly negates any arguments Guildford Borough Council has that this is anything but appeasing rich housing businesses that caused all these issues in the first place. The fact that this plague of housing is being considered here, next to London and the more affluent areas of the country, where the house prices are high is clearly to take advantage of the housing crisis caused by the over construction of houses just like these. A suggestion to the council and the government in general. Why not construct houses further north in the country where there is a demand for them, where they are more affordable and not inflated by the high land value that the green belt and Send in particular, offers? Why are you putting the benefit of overly rich construction firms, estate agencies and landlords above the wishes of your own constituents? With the apocalyptic economic disaster that is Brexit fast approaching, I understand the need to construct industrial and commercial areas, but why here? Why not further north in the country where people need housing, jobs and money?

Fifthly, and this is a point I am at odds with in terms of its respectability to a group of people, but there is not desire for any travellers sites and show-peoples pitches in Send. I admit I have limited experience with travellers, but my experience with travellers is overwhelmingly negative. While I am happy to be proven wrong in regards to travelling peoples, they are still more people living in Send if these plans and their additions go ahead. I must object to any Gipsy, Traveller and Show people's sites, parks, pitches and any other settlements in Send and it's surrounding area. These have been disproportionally allocated in the plans for Send (a point I shall return to later) and shows the lack of respect, once more, that the Guildford Council has for our views.

I have never felt this strongly about local politics, but after a new stream of unbelievably thoughtless and, frankly insulting, plans akin to throwing paint at a wall and seeing what sticks, I had to add my voice once more to the objections, this time with a personally written letter. What made this especially galling for us was the increase to the plans were submitted to our community after Send, as one voice, objected, you decided to punish us and add to these plans.

Taking into account all of my previous points, to read that you have made changes to the initial plans, means that you have disregarded the vast majority of your constituents in Send and their calls to end construction plans around Send. That was around 32,000 people!

You are supposed to represent and listen to us. You are accountable to us. You are supposed to serve us. Don't punish us for objecting, this is our town, our community, our home. I and over 32,009 people implore you: don't destroy our beautiful town in this relentless, ignorant pursuit to build. Forgive my passion, but your refusal to listen to our community is undemocratic and draconic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3484  Respondent: 17414561 / Elliot Rowland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Now 60 homes in place of 45 homes previously

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

• The increase to 60 homes in place of 45 homes is 33% more and too much]
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse
• It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3486  Respondent: 17414561 / Elliot Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Now 400 homes and 6 Travelling Showpeople plots

I object to the Policy A43 change at Garlick’s Arch because:

• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no “exceptional circumstances” exist
• It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth 1
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3488  Respondent: 17414561 / Elliot Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1715  Respondent: 17414561 / Elliot Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

- With the new Marina planned on the Wey navigation, removal of this area will facilitate the total erosion of the greenbelt in this area through the infill of further buildings in the future.
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

(b) Green Belt

The Green Belt inset boundary for Wood Street Village has been drawn very tightly (see Map 3 – in the attached document) to include only the east of the settlement: along Oak Hill east of Pound Lane and west of Pinks Hill; excluding Wood Street Green, the surrounding areas along White Hart Lane and the whole of Frog Grove Lane to the east and north. It is anomalous that the village conservation area, which helps to define the essential character of Wood Street Village, is outside the proposed settlement inset boundary.

The proposed inset boundary would allow for the development of some small sites in Wood Street Village including: land at 148 Broad Street, a site of 0.32 ha previously used for vehicle sales, maintenance and storage, which the Land Availability Assessment (LAA) of February 2016 identified as suitable for 12 dwellings (Site 115); a previously-developed site of 4.4ha with mixed uses at Oak Hill which the LAA identified as suitable for 22 dwellings (Site 35); and land to at ‘Roundoak, White Hart Lane which the LAA identified as suitable for traveller accommodation (Site 2114). These sites enter into the LAA housing figures, although only sites for 23 or more dwellings are shown on the Proposal Map.

The approach to Green Belt insets needs to comply with paragraph 86 of the NPPF which states:

‘If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.’

Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans, which includes ‘consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’ The Council’s Land Availability Assessment (February 2016) demonstrates that the Spatial Development Strategy of Policy S2, is unable to meet the objectively assessed need for housing throughout the plan period, largely because of constraints imposed by Green Belt Policy P2 and related proposals maps. Impacts on housing land supply are considered in more detail below.

The settlement boundary for Wood Street Green appears to have been drawn tightly to restrict development, rather than to allow for housing and other forms of development to take place within the settlement, to meet the changing social and economic needs of the village and the borough.

Not all the open parts of Wood Street Village are important for their contribution to the Green Belt. There are infill sites, such as those previously identified, where development could make a useful contribution to meeting housing needs, consistent with the size and character of Wood Street villages and its local facilities, and without compromising the essential roles of the Metropolitan Green Belt.

The Site of Nature Conservation Interest provides a natural boundary to the south of the village. To the north west of the village, it is reasonable to exclude Frog Grove Lane from the inset areas as it is essentially ribbon development extending for over a mile from Oak Hill/ Wood Street Green northwards to join the Aldershot Road (A323). A flood risk area and an area of registered common land are also constraints on development on Frog Grove Lane. However, the Green is clearly part of the core of the village and there are areas surrounding the Green that should also be included within the settlement boundary and Green Belt inset and should be allocated for appropriate development.
The inset boundary should therefore be extended westwards to include Wood Street Green, surrounding development and the sites previously identified as ‘Potential Development Areas’ (see Map 2 in the attached document); to allow for appropriate development within the functional boundary of the settlement in accordance with accessibility to local facilities, existing residential development and natural boundaries that can be defined on the ground, including roads and vegetation that would provide long-term, defensible, natural boundaries for the Green Belt.

(c) Conclusions

The need for additional housing land in the early years of the new Local Plan requires looking at a variety of sources and locations, including a more realistic approach to Green Belt Review. Housing need represents one of the exceptional circumstances that can justify alterations to Green Belt boundaries, as described in paragraph 83 of the NPPF. Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans which includes consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’

The Green Belt & Countryside Study states that it was not seen as pre-empting the Spatial Development Strategy, but in practice Green Belt was a major determinant of the Spatial Development Strategy and, as the Green Belt Review was completed before a full, objective assessment of housing requirements in the SHMA, Green Belt and the Spatial Development Strategy have both become constraints on meeting housing requirements, especially in the early years of the plan.

The Spatial Development Strategy (Policy S2) and Green Belt Policy (Policy P2) are not based on sufficiently positive approaches to reviewing the Green Belt and settlement boundaries and do not give sufficient weight to meeting objectively assessed housing requirements throughout the plan period. They do not comply with the NPPF and cannot therefore be considered to be sound. Modifications to the Plan should include sites such as those identified in Wood Street Village as residential allocations within an extended settlement boundary and Green Belt inset, as described above...

1. Background

1. Lightwood Strategic submitted representations on the Local Plan Issues and Options consultation in November 2013, on the Local Plan Consultation Draft (Regulation 18) in September 2014, and on the Proposed Submission Local Plan Consultation (Regulation 19) in July 2016. This submission updates those representations in response to further consultation on the publication of a revised Proposed Submission Draft (Regulation 19) in June/July 2017.

2. As the Council says that it is only consulting on changes in the current draft Local Plan compared with the previous Regulation 19 Consultation, this report responds to those changes and to new evidence, in particular relating to housing targets and housing land supply. It is in support of duly-made representations which are submitted separately in accordance with Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012. To make sense of those changes and to comment on the overall soundness of the plan it is necessary to refer to elements of the plan that have not changed.

3. Lightwood Strategic’s representations have consistently expressed concerns about the Council’s proposed approaches to:

   • the objective assessment of housing needs;
   • Green Belt review; and
   • Settlement boundaries in the larger villages, particularly at Wood Street Village.

4. Lightwood Strategic pointed out that there are natural infill sites in Wood Street Village (including the two ‘alternative sites’ shown on Map 1 - see end of document) that can provide SANG and are located only a short distance from the village green, shops and other amenities.

5. The Council identified these two sites in April 2014 as ‘Potential Development Areas’ in its Green Belt & Countryside Study (Map 2 - see end of document). It also undertook analysis of various characteristics of the settlement in its Green Belt & Countryside Study to determine whether it was appropriate to define an inset boundary rather than leave the whole village as ‘washed over’ by the Green Belt.
6. The Council has modified its approach to villages in the Green Belt, in response to the National Planning Policy Framework (March 2012). In the 2003 Local Plan villages were generally ‘washed-over’ by the Green Belt. New Local Plan Policy P2 provides for Wood Street Village and 13 other villages (as well as several, large previously developed sites) to be inset from the Green Belt. In these villages, Policy D4 (Development in Urban Areas and Inset Villages) allows for limited development within strict environmental guidelines.

2. The Green Belt Boundary

7. The inset boundary for Wood Street Village has been drawn very tightly (Map 3 - see end of document) to include only the east of the settlement: along Oak Hill east of Pound Lane and west of Pinks Hill; excluding Wood Street Green, the surrounding areas along White Hart Lane and the whole of Frog Grove Lane to the east and north. It is anomalous that the village conservation area, which helps to define the essential character of Wood Street Village, is outside the proposed settlement inset boundary.

8. The proposed inset boundary would allow for the development of some small sites in Wood Street Village including: land at 148 Broad Street, a site of 0.32 ha previously used for vehicle sales, maintenance and storage, which the Land Availability Assessment (LAA) of February 2016 identified as suitable for 12 dwellings (Site 115); a previously-developed site of 4.4ha with mixed uses at Oak Hill which the LAA identified as suitable for 22 dwellings (Site 35); and land to at ‘Roundoak, White Hart Lane which the LAA identified as suitable for traveller accommodation (Site 2114). These sites enter into the LAA housing figures, although only sites for 23 or more dwellings are shown on the Proposal Map.

9. The approach to Green Belt insets needs to comply with paragraph 86 of the NPPF which states:

‘If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.’

10. Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans, which includes ‘consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’ The Council’s Land Availability Assessment (February 2016) demonstrates that the Spatial Development Strategy of Policy S2, is unable to meet the objectively assessed need for housing throughout the plan period, largely because of constraints imposed by Green Belt Policy P2 and related proposals maps. Impacts on housing land supply are considered in more detail below.

11. The settlement boundary for Wood Street Green appears to have been drawn tightly to restrict development, rather than to allow for housing and other forms of development to take place within the settlement, to meet the changing social and economic needs of the village and the borough.

12. Not all the open parts of Wood Street Village are important for their contribution to the Green Belt. There are infill sites, such as those previously identified, where development could make a useful contribution to meeting housing needs, consistent with the size and character of Wood Street village and its local facilities, and without compromising the essential roles of the Metropolitan Green Belt.

13. The Site of Nature Conservation Interest provides a natural boundary to the south of the village. To the north west of the village, it is reasonable to exclude Frog Grove Lane from the inset areas as it is essentially ribbon development extending for over a mile from Oak Hill/Wood Street Green northwards to join the Aldershot Road (A323). A flood risk area and an area of registered common land are also constraints on development on Frog Grove Lane. However, the Green is clearly part of the core of the village and there are areas surrounding the Green that should also be included within the settlement boundary and Green Belt inset and should be allocated for appropriate development.

14. The inset boundary should therefore be extended westwards to include Wood Street Green, surrounding development and the sites previously identified as ‘Potential Development Areas’ (Map 2 - see end of document); to allow for appropriate development within the functional boundary of the settlement in accordance with accessibility to local facilities, existing residential development and natural boundaries that can be defined on the ground, including roads and vegetation that would provide long-term, defensible, natural boundaries for the Green Belt.

[See appendices for maps]
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Appendices Maps.pdf (1.5 MB)

Comment ID: pslp171/1744  Respondent: 17415009 / Lightwood Strategic (Lighwood Strategic)  Agent: Roger Daniels

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

(a) Five-Year Housing Land Supply

Based on the housing supply trajectory in the June 2017 LAA Addendum, but applying a constant annual housing requirement of 654 dwellings throughout the plan period, the five-year housing land supply from 2016/17 would be equivalent to only 2.36 years’ requirements: i.e. less than half of the five-year requirement and a deficit of 2,470 dwellings.

The Council’s approach to ‘phasing’ the housing target in in Policy S2 arbitrarily lowers the housing target below 654 for the years between 2019/20 and 2026/27, to reflect expected problems in the provision of infrastructure needed to deliver the Council’s proposed housing allocations. This approach is not justified in terms of housing requirements, but is solely a response to problems of housing delivery that result from the spatial development strategy.

Local Plan Policy S2 is therefore evidently not sound. For a Local Plan to be found sound, it is essential for the local planning authority to be able to demonstrate that there is a five-year supply of specific, deliverable sites for housing, with an additional 5% buffer, ‘to ensure choice and competition in the market for land’ as well as ‘a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15’ (NPPF, paragraph 47).

In this case, the Land Availability Assessment (June 2017 Addendum) demonstrates that there is not a five-year supply of housing land. It also shows that the projected supply of housing land will fall short of requirements for the next twelve years. There is therefore no possibility that the Local Plan should be found sound in these circumstances. A different spatial development strategy is required to identify sites for housing development that can be delivered in the early years of the plan period. Suitable, sustainable options will include sites that are closely related to the main urban areas and larger villages, and will entail a more detailed and realistic approach to reviewing the boundaries of the Green Belt.

...

3. Housing Needs and the Spatial Development Strategy

The Need for Housing


Past Performance
16. The following graph compares the OAN of 654 dpa with recent levels of housing completions in the Borough. The Housing Topic Paper (June 2017) notes that completions have been less than 300 dpa in all but one of the last nine years since 2008/9. [See attached for Graph 1]

17. There is clearly a challenge to raise housing completions to the level required by the SHMA and a substantial backlog of undersupply at the start of the plan period that should be met within the early years of the plan.

**Updated Housing Supply Trajectory**

18. A graph of the Council’s housing supply trajectory, compared with the Council’s ‘phased’ or variable housing target and information as shown in draft Policy S2 and in the June 2017 LAA addendum is reproduced below. It shows a continuing shortage of housing land supply, until at least 2024/25. [See attached for Graph 1]

19. However, this graph gives a misleading impression of the plan’s ability to deliver housing land in accordance with the SHMA’s objective assessment of housing needs (OAN) of 654 dwellings p.a., because of the ‘phasing’ of the housing requirement, in Local Plan Policy S2. The Council has arbitrarily lowered the housing target below 654 dpa between 2019/20 and 2026/27 to reflect expected problems in the provision of infrastructure needed to deliver some of its proposed housing allocations. This adjustment is not justified by the SHMA Addendum’s objective assessment of housing needs, policies of the NPPF or the guidance of the NPPG.

20. The graph below provides a more relevant and realistic picture; comparing the LAA Addendum’s housing supply trajectory with a target to achieve the SHMA Addendum’s housing requirement of 654 dpa throughout the plan period. [See attached from Graph 3]

21. This graph shows a continuing shortage of housing land until 2029/30, if the SHMA requirement of 654 dpa is applied consistently throughout the plan period. This continuing deficit for most of the plan period is concealed by the Council’s arbitrary and unjustified ‘back-end loading’ approach of ‘phased’ housing targets in draft Policy S2 which reduces the housing target below 654 dpa in every year between 2019/20 and 2026/27.

**4. Five-Year Housing Land Supply**

22. The housing supply trajectory also shows that the Borough has only 2.36 years’ supply of housing land available within the next 5 years against the requirement of 654 dwellings p.a. from 2015/16 in the SHMA 2017 Addendum: less than half of the 5-year requirement.

**Calculation of Five-Year Housing Land Supply from the LAA Addendum, June 2017:**

[See attachment for Table 1]

23. Proposals of the draft Local Plan therefore fail to comply with the NPPF because:

- they fail to meet the full, objectively-assessed needs for market and affordable housing in the housing market area;
- they fail (by a substantial margin of more than 50%) to identify a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer to ensure choice and competition in the market for land; and
- they fail to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; in fact, supply does not exceed the requirement of 654 dpa until the 15th year of the plan.

24. The Council suggests that housing targets should be phased towards the latter part of the plan period. Policy S2 includes the following statement (carried forward from the previous draft):

> ‘the delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year ... is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.’
25. Paragraphs 4.1.9a and 4.1.9b state:

'The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This is to build flexibility into the plan and demonstrate that our strategy is capable of delivering the target. It also adopts a phased target that gradually increases over time rather than the same annualised target of 654 homes each year. This is due to the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period.

'This phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five-year supply of housing from the date of adoption, as required by national policy. This will also take account of both the deficit accrued until that point and includes a 20 per cent buffer moved forward from later in the plan period. Without a rolling five-year supply of homes, relevant policies for the supply of housing would not be considered up-to-date.'

26. There is no justification for this approach in terms of the objective assessment of housing needs in the SHMA. The approach is supply led and demonstrates a failure of the spatial strategy to deliver housing sites in accordance with housing need, because of the limited range of proposed site allocations and problems with the delivery of infrastructure to serve some of the proposed allocations.

27. The Housing Topic Paper (June 2017) concedes in paragraph 4.37 that the draft plan does not ‘boost significantly the supply of housing’ as required by paragraph 47 of the NPPF and does not ‘deal with undersupply within the first five years of the plan period…’ as required by paragraph 035 of the NPPG.

5. The Council’s Spatial Strategy

28. The Council’s spatial strategy relies on a limited number of strategic sites where there are significant requirements for infrastructure that cannot be provided in step with housing requirements. It is a consequence of the Council’s reluctance to review Green Belt boundaries and to allocate sites on the edges of the urban areas which could be implemented earlier in the plan period.

29. The need to demonstrate a rolling five-year supply of housing is no justification for this approach to phasing as argued in paragraph 4.1.9b. Housing land supply should be measured against housing requirements and there is no justification in the SHMA for a phased supply of housing that increases towards the end of the plan period and remains below housing requirements for more than half of the plan period.

30. Measured against housing requirements, the Council is not able to demonstrate a five-year supply of housing land until the latter part of the plan period, even on the basis of the housing supply trajectory in the Land Availability Assessment, which is said (in paragraph 4.1.9a) to include higher figures than the local plan targets. To plan for housing provision that is below requirements for most of the plan period is clearly inconsistent with the policies of the NPPF and the advice of the NPPG (contrary to what the Council says in paragraph 4.1.10).

31. The Housing Topic Report (June 2017) admits in paragraph 4.189:

‘Whilst we are continuing to explore whether neighbouring authorities are able to help contribute towards our early supply, it is unlikely that this backlog will be capable of being met in the first five years of the plan as required by the NPPG without significant harm to the Green Belt, and other harm as identified in this topic paper. We consider this is justified on the basis of the significant level of infrastructure that is required to be delivered in order to ensure that development across the borough is sustainable. This is further exacerbated by the reliance on a number of strategic sites which by their very nature take longer to deliver’.

32. We also note that the Council no longer claims that the proposed increase in new homes would be in line with their Economic Strategy.

33. Changes in spatial strategy are therefore required to provide a planned supply of housing land that matches requirements over the whole of the plan period, including the allocation of sustainable sites that are not dependent on major infrastructure investment and can be developed early in the plan period. Meeting the Borough’s housing requirements will need the allocation of a wider range of sites, including small and medium-sized sites, in a range of sustainable locations that...
include some sites that are currently in the Green Belt on the edges of the urban areas, where modification of Green Belt boundaries will be necessary.

34. The shortage of housing land supply that would result from policies and proposals of the draft Local Plan constitute the ‘exceptional circumstances’ (NPPF paragraph 83) that would justify the alteration of Green Belt boundaries in the Local Plan.

35. These problems of housing land supply are not overcome by the Council’s approach to phasing in Local Plan Policy S2, by which the planned delivery of housing is deferred until later in the plan period. As noted above, this approach is not justified in terms of housing requirements, but is solely a response to problems of housing delivery that result from the spatial development strategy. Local Plan Policy S2 is evidently not sound.

36. For a Local Plan to be found sound, it is essential for the local planning authority to be able to demonstrate that there is a five-year supply of specific, deliverable sites for housing, with an additional 5% buffer, ‘to ensure choice and competition in the market for land’ as well as ‘a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15’ (NPPF, paragraph 47).

37. In this case, the Land Availability Assessment demonstrates that there is not a five-year supply of housing land. It also shows that the projected supply of housing land will fall short of requirements for the next twelve years. There is therefore no possibility that the Local Plan should be found sound in these circumstances.

38. A different spatial development strategy is required to identify sites for housing development that can be delivered in the early years of the plan period. Suitable, sustainable options will include sites that are closely related to the main urban areas and larger villages, and will entail a more detailed and realistic approach to reviewing the boundaries of the Green Belt.

6. Conclusions

39. The need for additional housing land in the early years of the new Local Plan requires looking at a variety of sources and locations, including a more realistic approach to Green Belt Review. Housing need represents one of the exceptional circumstances that can justify alterations to Green Belt boundaries, as described in paragraph 83 of the NPPF. Paragraph 85 of the NPPF sets out the proper approach to defining Green Belt boundaries in local plans, which includes ‘consistency with the Local Plan strategy for meeting identified requirements for sustainable development.’

40. The Green Belt & Countryside Study states that it was not seen as pre-empting the Spatial Development Strategy, but in practice Green Belt was a major determinant of the Spatial Development Strategy and, as the Green Belt Review was completed before a full, objective assessment of housing requirements in the SHMA, Green Belt and the Spatial Development Strategy have both become constraints on meeting housing requirements, especially in the early years of the plan.

41. The Spatial Development Strategy (Policy S2) and Green Belt Policy (Policy P2) are not based on sufficiently positive approaches to reviewing the Green Belt and settlement boundaries and do not give sufficient weight to meeting objectively assessed housing requirements throughout the plan period. They do not comply with the NPPF and cannot therefore be considered to be sound.

42. Modifications to the Plan should include sites such as those identified in Wood Street Village as residential allocations within an extended settlement boundary and Green Belt inset, as described above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Graphs.pdf (199 KB)

Comment ID: pslp17q/318  Respondent: 17415009 / Lightwood Strategic (Lighwood Strategic)  Agent: Roger Daniels
Do you consider this section of the document; complies with the Duty to Co-operate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The accompanying report by Lightwood Strategic points to shortcomings in the approach to housing land supply which is not consistent with the objective assessment of housing requirements in the Strategic Housing Market Assessment. It also points to shortcomings in the Green Belt & Countryside Study as the basis for reviewing Green Belt boundaries and identifying appropriate allocations to meet the objectively-assessed need for housing throughout the plan period.

In particular, the Land Availability Assessment (June 2017 Addendum) is not based on a consistent rate of housing delivery that reflects housing requirements. It shows a shortfall in housing land supply throughout much of the plan period, including the absence of a five-year supply of housing land on adoption of the plan.

In addition, the Green Belt review does not comply with the requirements of paragraphs 84 and 85 of the National Planning Policy Framework, as it does not give sufficient weight to the need to promote sustainable patterns of development or reflect long-term development requirements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/319  Respondent: 17415009 / Lightwood Strategic (Lighwood Strategic)  Agent: Roger Daniels

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Co-operate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Although Guildford Borough Council has generally complied with the statutory procedures for preparing the Local Plan, it has not complied fully with the ‘Duty to Co-operate’ which is a statutory requirement in Section 110 of the Localism Act 2011; particularly in relation to housing provision and Green Belt review.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/321  Respondent: 17415009 / Lightwood Strategic (Lighwood Strategic)  Agent: Roger Daniels

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
The Duty to Co-operate Topic Paper records ongoing discussions with neighbouring districts in Surrey on the production of a Local Strategic Statement (LSS). It also describes co-operation on a joint Strategic Housing Market Assessment (SHMA) but it does not point to any substantive agreement with neighbouring councils to ensure that the delivery of housing will meet the objectively-assessed needs of the Housing Market Area (HMA) throughout the plan period.

Paragraph 4.49 of the Topic Report refers to a Statement of Common Ground in which the three neighbouring authorities of Guildford, Woking and Waverley have acknowledged that there is unmet need within the HMA, but the Statement simply 'commits the three authorities to continued future joint working to ensure that as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full.'

The NPPF is explicit, in paragraphs 47 and 182, that local planning authorities should meet the full objectively-assessed need for housing in the housing market area, subject to other considerations, and should consider unmet housing needs in neighbouring authorities when formulating their local plan strategy. This has not been done by Guildford and its neighbouring authorities.

The Topic Report also concedes (in paragraph 4.93), in relation to Green Belt review: 'As the broad methodology that underpins the study was developed prior to the NPPF and Localism Act, we did not engage with neighbouring authorities at that time.'

In relation to both housing and Green Belt review, it is therefore clear that the requirements of the Duty to Co-operate have not been met: in terms of the legislation in Section 110 of the Localism Act 2011; in terms of the policies of the National Planning Policy Framework; or in terms of the advice in Planning Practice Guidance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
3) The increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House, negatively impacting the setting of these buildings and the wider Ockham Conservation Area

4) The increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB

5) The change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

6) The removal of additional 3.1 ha from the green belt without any justification

7) The failure of the council to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

8) The major changes made to the plan mean that this should not be a Regulation 19 Consultation. This type of consultation needs to be on the totality of the plan rather than the proposed changes.

9) There is no clear justification for the removal of one strategic site over site A35.

10) The plan is unsound within the original time frame and the council have chosen not to address this. They have ignored previous representations and not followed due process.

11) The transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

12) The housing number is unsound and open to legal challenge. The Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc.

13) The council claim this plan protects the borough's most important countryside, landscapes and heritage. It most certainly DOES NOT.

It is very apparent that the council have not taken on board many of the comments made previously on issues such as poor drafting and errors. When a comparison of the allocated sites is made there is clearly extremely inconsistent weighting on the various restrictions to suit their ends.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy A42 change at Clockharn in Tannery Lane where there has been an increase from 45 homes to 60. This change takes no account of hundreds of previous objections made by local residents. The increase in numbers of homes will have a seriously detrimental effect on the traffic in the area, particularly as Tannery Lane is a small country road and should remain as such. This development is a significant erosion of the Green Belt in our area and is totally out of keeping with the rural nature and views across the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to policy A43 change at Garlick’s Arch for the following reasons:

Again this change totally disregards the thousands of previous objections. It is a beautiful area of Green Belt with very valuable and beautiful ancient woodland – something which is totally irreplaceable. It is a massive development for a village of this size causing Ripley and Send to join up, something which Green Belt land is designed to prevent. Again – another development in this area will massively increase the congestion on surrounding roads, something which is already a particular problem in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to policy A58 at Burnt Common, London Road - which was deleted from the 2014 draft plan because of objections made previously. It is totally unnecessary and inappropriate to build industrial units on Green Belt land in a village of this size. There are already suitable and available sites within Slyfield and Guildford. Again any increased movements of industrial vehicles on the surrounding roads will lead to total gridlock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/1731</th>
<th>Respondent: 17415777 / Neil Buswell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Green Belt Policy 2, at paragraph 4.3.15; I object to the proposal to inset Send Business Park from the Green Belt for the following reasons:

- It is a non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.
- Tannery Lane, as previously mentioned, is a small country lane which should remain as such and is totally unsuited to increased traffic volume.
- Any additional expansion or development in this position will have a significantly detrimental effect on the Green Belt land in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1732</th>
<th>Respondent: 17415809 / Susan Wheeler</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy P3. ash green is not part of the Ash and Tongham urban area and therefore the ATUA boundary must not extend south of ash green road and foreman road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/461</th>
<th>Respondent: 17415873 / David Elvey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to the proposal to inset Send Business Park from the Green Belt because:

1. Any further development at this location would detract from the surrounding Green Belt countryside area and openness.
2. Tannery Lane is narrow and commercial vehicle traffic access is restricted.
3. As with the proposed development at Clockbarn Nursery any increase in traffic in Tannery Lane will cause further problems with traffic movements at its junction with Send Road (A247).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3524  Respondent: 17415873 / David Elvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 42 change at Clockbarn Nursery in Tannery Lane because:

1. It will worsen existing surface water flooding problems in the area.
2. The increase to 60 homes is an excessive increase from the previous 45 proposed and ignores the considerable number of previous objections raised by local people.
3. It will considerably increase traffic in Tannery Lane and related problems with traffic movements at its junction with Send Road (A247).
4. It will erode more of the green belt in the Send village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3525  Respondent: 17415873 / David Elvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy A43 change at Garlick’s Arch because:

There are no “exceptional circumstances” for development in this Green Belt area.

There is no proven demand in this location for Travelling Showpeople plots.

This area floods very often and is a designated floodzone.

The number of homes is excessive, will cause over-development in Send village and generate extra traffic that will considerably overload existing local and main roads in both Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3526</th>
<th>Respondent:</th>
<th>17415873 / David Elvey</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 – Land at Burnt Common because:

1. The 2017 Employment Need Assessment for the whole borough shows a demand reduction to 3.9 hectares, and such a demand for industrial or warehousing development can be met elsewhere in the borough without needing building in the middle of the Green Belt.

2. As with the proposed development at Garlick’s Arch this will lead to excessive extra traffic which will cause overloading and gridlock of local and main roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3539</th>
<th>Respondent:</th>
<th>17416193 / Karen Howieson</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase in the proposed number of homes for this site because the junction at either end of Tannery Lane cannot take the increased traffic load. It is a narrow country lane. The junction with Send Road is difficult to negotiate already. I also object because the number of homes for this location has been INCREASED even though there were previously hundreds of objections to the lesser number of new homes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

I object to this policy because it was deleted from the 2014 draft because of previous objections. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units and the impact on small surrounding roads will create even greater traffic gridlock than exists presently. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

I object to the proposal to inset Send Business Park from the Green Belt because Tannery Lane is very narrow and restricted to one vehicle width in several places. Increased traffic will make the area a danger for drivers. The area is alongside the stunning Wey Navigation and as such the area should be protected from development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The proposal for 1200-1750 homes is completely out of character for Ash Green and will coalesce Ash, Tongham and Ash Green losing a beautiful countryside location which is completely contrary to Policy P3 Countryside mentioned above. Any development in this area should be of a size and scale which keeps the intrinsic character and rural character of these sites.

Policy A29 Requirement 8 doesn't allow for the right level of protection for Ash Manor, a set of three listed buildings, and should be tightened to prevent developers from spoiling views, setting and driveway approach from White Lane. Listing buildings do not sit nicely against poorly specified and designed housing estates so something more appropriate is called for.

I'd like to highlight again the need for infrastructure before development here as the local roads are used as a rat run and are already under great pressure due to approved developments. Planning approval in this area should be predicated on the completion of the following improvements:

1. Ash Station
2. The Street Tongham
3. A331/A323 Intersection
4. A31 White Lane Junction

Ash Green is not and should not become part of the Ash and Tongham Urban Area.
Sustainable transport needs further work. Walking from Ash Green to Ash Station is downright dangerous. Cycling to Guildford as I do is only something for the most experienced cyclist and nobody new is going to do it as it's life threatening every day. The bus service is infrequent and no use for commuting. Where is the provision to improve this stuff coming from? Sustainable transport is not at the forefront of the plan and should be far more prevalent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3548  Respondent: 17416545 / Paul Finning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

These policies provide no provision for community spaces such as a village hall or larger recreation area. It's disappointing that the plan has nothing in this area for local people when it's absolutely trying to cover this land in houses leaving us nothing.

I object to the fact that the plan is trying to build so many houses in one area of Guildford's borough. It is not fair to push all development into one place and it would be far fairer to spread it out across the borough. I'm not against having development on my doorstep just not what I consider to be a large amount of it which is out of proportion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1746  Respondent: 17416545 / Paul Finning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ash Green is not part of the Ash and Tongham Urban area and I strongly disagree that it should be made so. I live in Ash Manor, which has a long history, and has always been part of Ash Green so please do not do anything to move Ash Green, as the current proposal appears to do, or coalesce Ash, Tongham and Ash Green. The green boundary's should stay in place to allow the villages to be separate. The intrinsic character of Ash Green should be be kept intact after any development.

Substantial development has been proposed for Ash Green and I believe it is vital suitable infrastructure to be in place before further development commences. The road infrastructure required includes work to the A31/A3 junction at Guildford, A331/A31 junction and improvements around Ash station as without these Ash Green, which is used as a rat run already, will be even more overrun and dangerous than it is already with small roads under large pressure. In addition
infrastructure for schools, doctors, shops, etc is also sorely lacking with the planning approvals we already have let alone those proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3551  Respondent: 17416641 / Naomi Lord  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Now 60 homes in place of 45 homes previously

I object to Policy A42 change at Clockbarn in Tannery Lane because the increase to 60 homes in place of 45 homes is up by 33%, an excessive amount. It ignores the hundreds of previous objections made by local people. It will add to the surface water flooding that we already have a problem with. It will further alter the village becoming more urban losing more Green Belt which was to protect natural or semi natural environments and to protect unique character of rural communities. It will put pressure on the local infrastructure and worsen access and traffic problems in Tannery Lane and the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3550  Respondent: 17416641 / Naomi Lord  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Now 400 homes and 6 Travelling Showpeople plots

I object to Policy A 43 because It will cause over-development of Send and the number of homes is excessive. It will join us to Ripley which will defeat the key purpose of the green belt. It is a beautiful permanent Green Belt and no “exceptional circumstances” exist. It is subject to frequent flooding. plots in this location. It ignores the thousands of previous objections made by local people. There will be pressure on village services and the excessive traffic that will cause heavy congestion on the A247 and the surrounding roads of Send and Ripley. There is no proven demand for plots for Travelling Show people.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3549  Respondent: 17416641 / Naomi Lord  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road

Now a new allocation for a MINIMUM of 7,000 sq m of industrial or warehousing

I object to the word “minimum” now being shown which changed from “maximum” in the 2016 Plan as since that time there has been a decline in demand for industrial land. This was deleted from the 2014 draft because of all the objections made previously.

We will become a suburb joining into Ripley which works against the creation of the Green Belt which is to protect natural or semi natural environments, protect unique character of rural communities that might be absorbed by expanding suburbs. I object to the traffic congestion this will have on the A247 and smaller roads.

I object to the need to build warehouse/industrial development in the middle of the Green Belt because Slyfield/Guildford have empty sites and industrial units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1748  Respondent: 17416641 / Naomi Lord  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because further expansion or development at this area detracts from the openness of the Green Belt and is inappropriate. I object as we must protect the unique character of Send and the Wey Navigation which this sort of development could easily deteriorate. The access in and out of Tannery Lane is very bad especially at busy times of day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3552  Respondent: 17416801 / Angharad Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Now 60 homes in place of 45 homes previously
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

• The increase to 60 homes in place of 45 homes is 33% more and too much]
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse
• It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3553  Respondent: 17416801 / Angharad Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A43 change at Garlick’s Arch because:

• It ignores all the thousands of previous objections made by local people
• There is no proven demand for Travelling Showpeople plots in this location
• It is beautiful permanent Green Belt and no “exceptional circumstances” exist
• It will cause over-development of our village and the number of homes is excessive
• It is exquisite ancient woodland that existed at the time of Elizabeth I
• It will join up Ripley and Send and defeat the key purpose of Green Belt
• It is subject to frequent flooding and is currently a flood zone 2 allocation
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3554  Respondent: 17416801 / Angharad Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

I object to Policy A 58 at Burnt Common because:

• It was deleted from the 2014 draft because of all the objections made previously
• The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land.
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1753  Respondent: 17416801 / Angharad Good  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposal to inset Send Business Park from the Green Belt because:

- With the new Marina planned on the Wey navigation, removal of this area will facilitate the total erosion of the greenbelt in this area through the infill of further buildings in the future.
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/325</th>
<th>Respondent: 17416801 / Angharad Good</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am writing to object to the latest draft local plan. I note that you are only accepting comments to the changes versus the previous plan, so I would ask you to read my comments below in conjunction with those that I have already written to you about in 2016, when you published the previous set of proposals. I have attached a copy of this letter for your ease of reference.

I have been a resident in Send for over 20 years and have seen how strongly local people feel about the proposed changes to our village. This included raising a large proportion of the objections to the previous plan as well as electing two Borough Councillors who primary objective is to save Send’s Greenbelt status. However, it appears that none of these objections have been taken into account at all. If anything Send seems to have been unfairly penalised for this activity with the inclusion of even more development in the latest version of the plan, making things even worse for our village.

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I have detailed my objections to specific policies below, but having drawn a - somewhat rudimentary- map of all the proposed development the impact of the changes can be seen in their entirety ( See attachment) This map does not illustrate the additional impact on traffic and other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:  pslp172/3563</th>
<th>Respondent:  17416929 / Ian Waring</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As above, existing brownfield sites could be utilised to accommodate the required development. There are unused sites and existing capacity for expansion in areas such as Slyfield. Traffic would increase through Send to unacceptable levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:  pslp172/3575</th>
<th>Respondent:  17417217 / Paul Good</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery, Tannery Lane, Policy A42 Now 60 homes in place of 45 homes previously I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction
- It will make erosion of the Green Belt in our village worse
- It will make surface water flooding, which is already bad, even worse
- It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:  pslp172/3576</th>
<th>Respondent:  17417217 / Paul Good</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Now 400 homes and 6 Travelling Showpeople plots I object to the Policy A43 change at Garlick’s Arch because:
It ignores all the thousands of previous objections made by local people
There is no proven demand for Travelling Showpeople plots in this location
It is beautiful permanent Green Belt and no “exceptional circumstances” exist
It will cause over-development of our village and the number of homes is excessive
It is exquisite ancient woodland that existed at the time of Elizabeth 1
It will join up Ripley and Send and defeat the key purpose of Green Belt
It is subject to frequent flooding and is currently a flood zone 2 allocation
It is contaminated by lead shot accumulated over fifty years
It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp172/3577  Respondent: 17417217 / Paul Good  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously • The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units • The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt • The impact on small surrounding roads will create traffic gridlock • It will join up existing villages and defeat the purpose of the Green Belt
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1758</th>
<th>Respondent:</th>
<th>17417217 / Paul Good</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt, Policy 2 at paragraph 4.3.15 Send Business Park now taken out of the Green Belt altogether I object to the proposal to inset Send Business Park from the Green Belt because:

- With the new Marina planned on the Wey navigation, removal of this area will facilitate the total erosion of the greenbelt in this area through the infill of further buildings in the future.
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp17q/327</th>
<th>Respondent:</th>
<th>17417217 / Paul Good</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the latest draft local plan. I note that you are only accepting comments to the changes versus the previous plan, so I would ask you to read my comments below in conjunction with those that I have already written to you about in 2016, when you published the previous set of proposals. I have attached a copy of this letter for your ease of reference.

I have been a resident in Send for over 20 years and have seen how strongly local people feel about the proposed changes to our village. This included raising a large proportion of the objections to the previous plan as well as electing two Borough Councillors who primary objective is to save Send’s Greenbelt status. However, it appears that none of these
objections have been taken into account at all. If anything Send seems to have been unfairly penalised for this activity with the inclusion of even more development in the latest version of the plan, making things even worse for our village.

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I have detailed my objections to specific policies below, but having drawn a - somewhat rudimentary- map of all the proposed development the impact of the changes can be seen in their entirety (See attachment) This map does not illustrate the additional impact on traffic and other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3578  Respondent: 17417377 / Oliver Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of the Land at Wisley Airfield (A35) in the draft Local Plan for many reasons, including:

1. It is further from railway stations than any other identified strategic sites.
2. It is adjacent to the most congested stretch of strategic road network in the county and close to the most congested junction in the country (J10)
3. Local roads are at capacity particularly when the SRN is not free-flowing
4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs. It is unrealistic to suggest sustainable methods of travel such as cycling and walking could be used.
6. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
7. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

Despite having received thousands of objections from both local residents and statutory consultees, the council has failed to remove this site from the Local Plan and yet other sites have been removed. I can see no clear justification for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1759  Respondent: 17417409 / Lauren Rathbone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the local plan because Guildford needs more affordable housing for students and young people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/468  Respondent: 17417569 / Sue Atkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I fully support the removal of site A46 (1100 homes and school) and site A47 (50 homes) from the draft local plan. My reasons for the support of their removal is the infrastructure would have been unable to support the level of building on this scale.

Removal of the green belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries. I would like to object to the removal of these areas from the green belt on the basis that development will be far greater if this removal occurred. The openness of the green belt would be destroyed by this proposal.

I would also like to object to a large number of properties being built in close proximity to Normandy. The current infrastructure is unable to cope with this demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3580  Respondent: 17417569 / Sue Atkins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
I would like to OBJECT once again to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan. I have already sent in my objections on previous occasions and would like you to pass on these comments together with all my previous comments to the Inspector. There are numerous errors in the plan and it has a considerable lack of clarity.

Below, I have highlighted some of the major objections I have as to why I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan:

1) I object, unreservedly, to the increased area of the site as this now backs on to our house, UPTON FARM, which is one of the heritage sites in Ockham, and would have a huge impact on our outlook and views all around. Not to mention the noise pollution, environmental impact, and loss to our quality of life. We have spent years adhering to the stringent Heritage Rules to make sure this house is in keeping with its period and history.

2) I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

3) Local roads are at full capacity and often grid-locked in the rush hours, particularly when the weather is bad, when taking the children to the local school.
4) It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10).

5) The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”!

6) The change to the site boundaries are not identified correctly on the plan (Appendix H p16) - I object to this.

7) I object to para 21 which “limits” development in flood zone 2 and 3. Development should be EXCLUDED in flood zone 2 and 3.

8) I object to the fact that the council has failed to remove this site from the local plan, despite receiving 1000’s of objections from local residents and statutory consultants.

9) I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

10) I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

11) I object to the Council wasting tax payers and residents’ time and money not following due process and also ignoring previous representations over the years.

12) I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

For all the above reasons, and numerous other reasons, I consider this plan is unsound and should be removed from the plan as soon as possible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pssl172/5200  Respondent: 17417729 / The Co-operative Group and Scape Living (TCG SL)  
Agent: Barton Willmore (Ben Shaw)


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[text of attachment reproduced below]

Introduction

1. We act on behalf of The Co-operative Group (‘TCG’) and Scape Living (‘SL’), and have been instructed to submit a further representation to the Proposed Submission Local Plan: Strategy and Sites (June 2017).

2. As you will be aware TCG is the landowner of a site known as ‘Kernal Court, Walnut Tree Close’ (‘the Site’). This Site is designated in the emerging Site Allocations as ‘Policy A13: Kernal Court, Walnut Tree Close, Guildford’. The extent of the Site is identified on the accompanying Site Plan provided at Appendix 1.
3. SL, an established student housing provider and operator of the adjacent highly successful student accommodation site “Scape 1”, has agreed terms with TCG in relation to a potential redevelopment of the Site for purpose built student accommodation. This is the subject of early pre-application discussions with Borough Council Officers in advance of the submission of a Planning Application by late 2017. The scheme will meet a demonstrable need for additional purpose built / managed accommodation in this location based on SL’s own experience including a significant waiting list.

4. The proposed development is supported by the University of Surrey (‘UoS’) (see the letter at Appendix 2) and other Higher Education Institutions in the Guildford area as a means of providing modern, well managed and accessible accommodation for those students living off-campus. This is to meet an increasing need for such a form of accommodation which is increasingly preferred by students to traditional shared living in rented accommodation in the private sector.

5. The submission of this representation follows the representations submitted by TCG in November 2013, September 2014 and July 2016 to the Strategy and Site Issues and Options consultation and the Draft Local Plan consultation respectively.

29. As stated above, TCG is the owner of the Site allocated under draft Policy A13 for approximately 100 homes (Use Class C3) which has been the subject of pre-application discussions with your Officers for the redevelopment of the Site to provide residential and / student accommodation.

30. SL, a student housing provider, partners with institutions and developers to provide high quality and affordable purpose built student accommodation and have expressed interest in redeveloping the Site. The UoS have written a letter (Appendix 2) supporting SL’s proposals to provide more purpose built student accommodation within Guildford, for the benefit of their students, whilst easing the existing and future housing pressures in the Town.

31. On behalf of TCG and SL, we support the principle of the Policy which confirms the acceptability of the removal of the industrial use at the Site and the replacement with residential. However, we object to the land use intent of the Policy as we consider that the allocation should not be solely for residential use. The Site should instead be allocated for residential (Use Class C3) and / student accommodation.

32. Student accommodation is considered to be an entirely appropriate use given the Site’s proximity to the Railway Station, the Town Centre and in particular its easy walking distance to the University Campus. The Site’s constraints (in terms of access, irregular shape not lending itself well for employment use), the Site’s surrounding uses (including student accommodation adjacent to the Site), the nature of the forthcoming uses and the transition occurring in the area also underline its suitability for both residential and student accommodation. This is recognised within supporting text of Policy A13 which highlights the changing character in the area from primarily industrial to residential (including student accommodation).

33. We note that the site was originally identified for student accommodation in the initial draft versions of the Plan. This position appears to have changed following an assessment of the site’s suitability in Land Availability Assessment (LAA) February 2016. This concluded that the site is most suited for residential development to provide new homes to help meet the identified need. It also stated that C3 housing can flexibility meet the needs of the local population, including students who wish to live in the local community. Despite this encouragement of students in this location (albeit living in C3 units), the assessment also concluded that it would also be prudent to avoid an overconcentration of specific purpose built accommodation in this locality.

34. We consider the assessment of the site in the LAA to be flawed for the following reasons:

(i) There is no accepted definition of ‘overconcentration’ in the Plan or Guidance. It is also highly unreasonable to conclude that overconcentration would occur when there is only one existing student accommodation in the immediate locality and the possibility of only one further building.

(ii) Despite wishing to avoid an overconcentration, the LAA actually encourages student accommodation in the proposed C3 allocation. This would undermine both the housing need requirement by removing accommodation from the private sector and encourage students to live in unmanaged accommodation where the negative effects of student living are far more likely to arise with an impact on wider residential amenity. This would simply not occur in a privately managed accommodation building such as Scape 1.
(iii) The site has the potential to make a far greater contribution towards housing need than is identified in the LAA. A conventional residential scheme is only likely to have a capacity of 100 units. Applying affordable housing policy and mix requirements, we estimate that such a scheme could accommodate 162 students. The emerging SL scheme identifies the site as having a capacity for circa 350 rooms plus circa 14 C3 flats. This represents a significant net increase in both the student capacity but also the amount of private sector accommodation that will be made available to other housing needs as a consequence of the development. A student housing scheme in the right location (such as this) can therefore make a far greater contribution to housing needs in the Guildford area.

35. TCG and SL has considered their options for the Site and concluded that student accommodation represents a deliverable and viable development opportunity and as such, seeks that Policy A13 is amended to include the allocation for residential (Use Class C3) and / student accommodation (Sui Generis).

36. It is important to reference Paragraph 4.2.7 of the emerging Local Plan which confirms that any additional student accommodation built over and above projected need will count towards the general housing requirement. As such the provision of student accommodation (regardless of whether it is meeting an identified need or not) will relieve pressure on the housing market in a location that is entirely appropriate for such a land-use.

37. Accordingly, the emerging Local Plan should be updated to reflect these comments within Policy E3 and Policy A13.

Affordable Housing

38. We note at paragraph 4.2.35 the Plan identifies the types of residential accommodation within Use Class C3 where affordable housing will be sought. In accordance with PPG paragraph 21 (as referred to in paragraph 9 above), we recommend the Plan specifically states that student accommodation is not required to provide affordable housing due to its ability to increase the availability of low cost housing.

Thames Basin Heaths Special Protection Area

39. We note that the supporting text to Policy P5 (see paragraph 4.3.51) has been amended to include the requirement for student accommodation to contribute towards the provision of SANG. This is on the basis that it is considered to be a form of permanent accommodation.

40. This is a change from the adopted Local Plan and also the determination of the Planning Application for Scape 1 in 2014 where student accommodation was considered to be exempt as it is not a form of permanent accommodation and falls outside the C Use Class. There has been no material change in national guidance to have justified this change in approach and it remains the case that student accommodation is not permanent as it is temporary, term based living. In addition, students generally do not use the Thames Basin Heaths for leisure purposes and are not dog-owners in the local area to the extent they would have an impact that necessitates a contribution.

41. On this basis, we recommend student accommodation is removed from paragraph 4.3.51.

Examination and Next Steps

42. We trust the above will assist in the formulation of the Local Plan and request that these recommendations are reflected within the submitted Local Plan. It is important to note that, as we are proposing changes to the Local Plan, we would like to participate in the Local Plan Examination in order to contribute towards the proceedings to best inform the examination and present amendments / additional evidence so the Plan can achieve soundness. In the meantime, we would be happy to discuss these representations in more detail with GBC Officers.

[Appendix's in attachment]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 24099_A3_LP_Rep_240717_FINAL.pdf (3.0 MB)
24. We repeat our previous representation in July 2016 in relation to draft Policy E3. Draft Policy E3 of the emerging Local Plan considers employment capacity. This policy protects employment floorspace within the Borough, this includes Strategic Employment Sites, Locally Significant Employment Sites and existing employment sites that are not specifically allocated for employment use. This could potentially apply to the existing Site given the historic and present employment use which remains on part of the Site.

25. The Policy sets a requirement for a 12 month active and comprehensive marketing period for the current employment use of the site if it is proposed to change the use of the existing employment site. TCG objects to this Policy as it adds unnecessary barriers for the redevelopment of existing employment sites that are more suited for alternative uses.

26. Sites that are in an existing employment use, but allocated within the emerging Local Plan for an alternative use, should not be protected by this Policy and subject to the requirement of a 12 month marketing period as the site allocation confirms the acceptability of the site for the alternative use. In this regard, the Evidence Base’s identification of the Site for alternative use should offer sufficient justification to override the submission of any further suitability evidence. As such, Policy E3 should be amended to exclude the marketing requirement for existing employment sites allocated for an alternative use within the Local Plan. The third bullet point of Policy E3 relating to employment floorspace outside designated employment sites should be reworded as follows (our additions):

- ‘Employment floorspace will be protected in line with latest needs assessment and the loss be resisted outside designated employment sites, unless the site is allocated for an alternative use. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (of offices, research and development or industrial) for a continuous period of at least 12 months. If the site is allocated for an alternative use within the Local Plan, the marketing period is not required’.

27. This is considered acceptable as it will deliver sites that have been allocated as suitable for alternative uses and required to deliver the overall plan strategy. It will also ensure the deliverability of the site allocation and the important contribution it makes towards the Plan’s residential targets.

28. The NPPF (Paragraph 22) highlights that planning policy should avoid the long term protection of sites for employment use where there is no reasonable prospect of the site being used for that purpose. Therefore to ensure the emerging Local Plan is consistent with National Policy in terms of being ‘sound’ (NPPF, Paragraph 182), flexibility should be applied to this policy to allow the release of employment sites where there is not considered to be a reasonable prospect of the Site being used for that purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[text of attachment reproduced below]

6. Draft Policy H1(5) of the emerging Local Plan considers student accommodation. This part of the Policy directs purpose built student accommodation for full time higher education Guildford based students on campus locations where appropriate. The Policy states that about 60 per cent of full time Guildford based University of Surrey students are expected to be provided within accommodation on campus. It is implicitly assumed that there is no material change in student numbers within other institutions.

7. The supporting text to this Policy states, in relation to monitoring the contribution of new homes against the identified local housing requirement, that “Purpose built student accommodation on campus…are considered separately from general housing needs in this plan” and “Any additional student accommodation or residential institutions built over and above the projected need (as identified in the SHMA) will count towards the general housing requirement, based on the amount of accommodation it releases into the general housing market”.

8. These statements are considered to be unsound and flawed when interpreted against the guidance set out within the Planning Practice Guidance (‘PPG’). The PPG is clear at Paragraph 038 that:

“All student accommodation, whether it consist of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirements, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double counting”.

9. The PPG recognises the importance of purpose built student housing on mitigating the pressure on market housing. The PPG states at Paragraph 21, inter alia, that:

“Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increase in overall housing stock”.

10. The Council’s approach of considering purpose built student accommodation, on campus, separately from the general housing need, does not take into account the impact this may have on market housing. Both Paragraphs within the PPG makes clear that student accommodation need should be planned for and addressed through the plan-led process.

11. The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 (‘SHMA’), prepared by GL Hearn on behalf of Guildford Borough Council (‘GBC’) sets out recent trends in student growth in Guildford and the number/proportion of students which can be expected to require housing within Guildford. The SHMA directly informs draft Policy within the Proposed Submission Local Plan. We consider that a number of inaccurate assumptions have been made within the SHMA which has resulted in the underestimation on the impact student growth will have on the housing market.

12. Firstly, the SHMA only assesses the estimated growth in student numbers in the UoS, which is the largest but not the only institution within Guildford Borough. The Proposed Submission Local Plan, at Paragraph 4.2.16 recognises the variety of further and higher education establishments which include, Guildford School of Acting, the University of Law, Guildford College including Merrist Wood, the Academy of Contemporary Music and the School of Horticulture at RHS Wisley. There is no mention on the future growth of any of these institutions or the impact any future growth may have on the local housing market. Without a buffer within the OAN to include the impact of all institutional growth, there is potential that the conclusions set out in the SHMA on student growth and impact on local housing market are underestimated.
13. The SHMA states that the aim of UoS is to provide accommodation for 50-60% of full-time Guildford-based students. On the basis that 55% of these students live within halls of residence, and 45% can be expected to live in the wider housing market.

14. The SHMA sets out a total of 15,280 UoS students in 2015/2016 of which 92% equated to full-time equivalents (14,005) and 70% of the full-time equivalents (10,700) were based in Guildford requiring accommodation in the Borough. UoS is planning to increase the total headcount of students to 23,000 by 2026/27 academic years.

15. The SHMA states at paragraph 7.5 that the “proportion of the total students which is full-time Guildford-based could be expected to fall from the current level of around 70%, for instance as a result of growth in degree apprenticeships and foundation students” . We consider there to be no appropriate justification or evidence to support this statement. The SHMA continues to state that “the number of full-time Guildford-based students is expected to increase from 10,700 (2015/16) to around 14,500 over the next ten years (to 2026/27)” . This is only 63% of the overall anticipated head count of 23,000 students in 2026/27 academic year. Given that there is no justification or evidence for this 7% decrease in full-time Guildford based students there is potential that the conclusions set out in the SHMA on student growth and impact on local housing market are underestimated.

16. We consider that the SHMA should have applied the current levels of 70% of full-time students to be Guildford based, as this can be based on clear evidence. This is a consistent approach within Appendix C of SHMA 2015. This would equate to 16,100 full-time Guildford based students and uplift of 5,400 students by 2026/27. This would then equate to 2,430 students expected to live within the general housing stock (45%). On the basis that the SHMA deems there to be an average of 4 students per household, this would equate to around 608 dwellings over the 17-year Plan period, equating to an average of 36 dwellings per annum moving forward. This is an adjustment of an additional 12 dwelling per annum against the SHMA’s conclusions and the Borough’s overall housing need.

17. Notwithstanding, the SHMA continues to state that “there is some uncertainty regarding longer-term growth, and we have not therefore made any assumptions about longer-term growth in student numbers” (our emphasis) and that “given the aspirational nature of the University’s growth expectations, we have assumed that this scale of growth (3,800 additional full-time Guildford-based students) is achieved over the plan period to 2034” We consider that the SHMA fails to take into account the impact of student growth on the local housing market in the last 7 years of the Plan-period, and therefore the impact could well be underestimated within the OAN.

18. Critically the SHMA also identifies that 1,710 (or 45%) of UoS students could be expected to live within the general housing stock which is in addition to any purpose built requirement. Such a number can be increased when the other Education Institutions in the town are included in the analysis. As such, the town’s private housing stock is accommodating a significant number of students in the private sector that could otherwise be accommodated either on-campus (where the places exist) or in purpose built student accommodation. Purposed built student accommodation should be promoted through the Proposed Submission Local Plan to positively free-up current and future private stock, being used for student accommodation, for the use of private sector requirements, particularly those with affordable needs. This is recognised by the PPG which recognises the importance of purpose built student housing on mitigating the pressure on market housing, specifically the private rented sector. It may then also place less pressure on the overall private sector housing target.

19. It is therefore concluded, that the Evidence Base is incorrect in relation to student growth and the impact on the OAN. Based on the significant need identified by SL in discussion with both UoS and other Institutions in the Borough, it is considered that there is a far greater need for well-located and accessible purpose built student accommodation than the Plan and Evidence Base accounts for.

20. Paragraph 4.2.9 of the Proposed Submission Local Plan, relates to family housing and recognises the number of children under 15 is projected to increase throughout the Plan period, and that the Council needs to plan carefully for family housing. This will be encouraged through a reasonable quality and size of accommodation in the private rented sector, in particular two and three bedroomed homes.

21. It is clear that the 45% of full-time Guildford-based students would be in direct competition with affordable family homes, of which the Council see as a housing priority. If the OAN figure is underestimated in relation to impact of student growth, there will be a direct impact to the local housing market and specifically affordable family homes.
22. Against this background, we recommend draft Policy A13 of the Proposed Submission Local Plan is amended to include specific allocations for student accommodation (Sui Generis). The allocations should be based on updated Evidence Base which accurately reflects the needs of all of the Town’s Educational Institutions (not just UoS) and places a much greater emphasis on removing students from the private affordable sector.

23. We would welcome an opportunity to input into the updating of the Evidence Base and to formulate an appropriately worded policy with GBC before this Plan is submitted to the Secretary of State and the subject of Examination.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1760</th>
<th>Respondent:</th>
<th>17417889 / Rosemary Reynolds</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to policy P2 proposing the insetting of East Horsley from the green belt. The government has promised to protect the green belt and you should heed this. I also object to any movement of the settlement boundary, you have given no reason for this.

I strongly object to site policy A35. You previously gave 14 reasons for your rejection of the proposed development of Wisley airfield. Despite this you have included it in. Your revised plan, why, what has changed.

I object to the revised 2017 local plan, the calculation of housing need is opaque it will therefore be challenged.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3584</th>
<th>Respondent:</th>
<th>17417985 / John Dumbleton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
The NPPF is clear that Local Plans should only meet objectively assessed needs if any adverse impacts of doing so do not significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. GBC have not put forward any meaningful justification of the benefits from the development of Gosden Hill Farm outweighing the harm to the Green Belt. On that basis alone, Policy A25 should not be part of this draft of the Local Plan.

In fact, it is impossible to make any really meaningful comment on many aspects of this Policy since there is so little detail in the Plan on internal design, infrastructure and transport connections for the Gosden Hill Farm site other than to note it introduces continuing unacceptable uncertainty and particularly since there is now so little apparent commitment from the Highways Authorities to provide the necessary road infrastructure.

Reliance on the developer to fund much of the infrastructure including the SMC, A3, Park and Ride and Merrow Station seems unrealistic and the obligations should certainly be better spelt out well before the planning application stage.

Improvement to the A3 is critically important to any development of Gosden Hill Farm. As mentioned above, it is self-evident that the pressure on local roads in Burpham is already intense in peak periods and these roads are clearly not suited to carrying large volumes of traffic. Under the Plan, congestion is very likely to be worse than it is now. Consequently, it should be a fundamental requirement that the Gosden Hill Farm development should only go ahead with a four-way junction connection to the A3 and preferably with a tunnel under the A3.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/1763 **Respondent:** 17417985 / John Dumbleton **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

It is generally accepted that at peak times the A3 around Guildford and local roads in Merrow and Burpham are performing at over capacity. Anyone who has experienced traffic congestion in this area knows that the level of growth planned for this area will undoubtedly make it even worse notwithstanding the proposed schemes to improve the highway network. The transport infrastructure is another constraint that has not been properly assessed even with all the proposed measures being proposed to alleviate congestion around Guildford which have themselves been watered down in this draft Plan.

Policy ID1 states that the delivery of development may need to be phased to reflect the delivery of infrastructure to be secured by planning condition and planning obligation. This approach is not strong enough. Site development should not be allowed to proceed unless strong and satisfactory guarantees or undertakings to provide the essential elements of the infrastructure needed have been given by developers and other bodies providing those elements.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/1761 **Respondent:** 17417985 / John Dumbleton **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

---
I dispute the revised OAN figure in the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017 because the analysis of the demographic and economic need figures produced by GL Hearn (GLH) on which it is based is fundamentally flawed.

I have read the review by NM Strategic Solutions Ltd (NMSS) of the Addendum Report as well as the original SHMA which can be found on Guildford Residents’ Association’s website. NMSS have identified a number of serious defects in GLH’s Report which completely undermines the reliability of the OAN. For example, GLH seriously over-estimated the population growth for Guildford by over-estimating student net migration into Guildford. If proper adjustment is made for the outflow of students in the period 2001-15, NMSS calculated that this would reduce the demographically-based estimate of the number of homes needed for the period 2015-34 from 558 to 404 pa based on student figures alone. It should also be noted that Inspector examining Waverley BC’s draft Local Plan accepted NMSS’s demographic analysis as opposed to that of GLH. Even the Office for National Statistics has conceded that there is a problem with their existing statistics for Guildford that needs to be addressed.

Furthermore, NMSS also demonstrated the OAN is based on GLH’s flawed estimate of the number of homes needed to support economic growth.

Like many others, I consider the shortcomings in GLH’s Reports do not entitle GBC to depend on the OAN to support its target figure of 12,426 new homes during the plan period.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3597  **Respondent:** 17418401 / Charles Penny  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

I strongly object to the increase of houses at Clockbarn Nurseries (Site A42)

The areas around the site of A42 is not at all suitable for a further increase from 45 to 60 homes. Tannery Lane and Papercourt Lane are single track lanes for the large majority and not suitable for more cars and with the Marina the lanes will simply not be able to cope. This will push further traffic from the smaller lanes onto the A247 and Newark Lane which are already heavily under pressure especially in peak times.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: pslp172/3594  Respondent: 17418401 / Charles Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the extended development within the Green Belt and the addition of 6 Travelling show people sites at Garlick’s Arch (A43)
   - I object to the extension of Garlick’s Arch as it is entirely inappropriate for the Green Belt and will only increase Urban Sprawl. I also object to the proposal of 6 plots for travelling show people and there is no need for these to be built as the allocation in site A50 more than covers the 8 ‘needed’ as mentioned in the plan.
   - The further extension of the homes at Garlick’s Arch if the plots aren’t used is completely unsustainable and will put a stretch on the area of Ripley and Send like never before. People move to this area for its idyllic country life style (as mentioned in the plan 2.10a as something to protect) and even now, especially in rush hour there are constant queues of traffic and the roads are just not made for it. In addition to the strain on the roads, the schools and surgeries will also be hugely affected due to the sheer number of people.

Filling in Garlick’s Arch further will also close the gap between Ripley/Send and Burnt Common which defeats the object of the Green Belt to keep the area open.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3596  Respondent: 17418401 / Charles Penny  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The initial reason for having floorspace at Garlick’s Arch was because it was further away from the Burnt Common area and increasing the separation between here and the site at Gosden Farm. However putting the floorspace up at Burnt Common further removes the need for Garlick’s Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3595  Respondent: 17418497 / Amanda & Michael Sleet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

2789
We understand that the infrastructure schemes associated with this proposed 1,800-home development will wreak havoc on the surrounding road networks, affecting many roads and residents in Guildford and Waverley.

We understand that the site depends on two new schemes:

- Widening of the A3 through Guildford
- A new western link road from the A31 to the Tesco Roundabout at Guildford

Guildford Borough Council’s own traffic modelling has shown that both these schemes will result in a surge in traffic along the B3000 in Puttenham, Compton, Farncombe, Binscombe and Artington (with similar traffic increases along the parallel Charterhouse/Hurtmore and Priorsfield roads), as well increased traffic and congestion on the A31.

Compton, which will experience a 15% increase in traffic in the northbound direction alone, already has air quality problems and nitrous dioxide levels well above the EU legal limit have been consistently recorded over the past three years. The Parish Council has requested that The Street is made a Air Quality Management Area.

Aside from the congestion problems, a six-lane motorway through Guildford will cause severance, as well as increased noise and air pollution; whilst the new “western link” road will slice through the Surrey Hills Area of Outstanding Natural Beauty, through 18th century parkland and a belt of ancient woodland.

We are therefore writing to register our continued objection to the Policy 26 Blackwell Farm site allocation. Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1. disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
2. directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
3. ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
4. adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed increase of a further 16 houses on the Clockbarn Nursery site. This is a totally unsuitable site anyway for a high density development. Increasing the number of houses completely exacerbates the situation.

Traffic movements from the site coupled with traffic accessing the new Marina development and then trying to join Send Road would cause considerable problems for residents and through-traffic alike. Access from Tannery Lane to Send Road is very limited and trying to join it, particularly at peak times, would be extremely difficult.

Send Road is already used to capacity by traffic heading to and from Junction 10 on the M25 and is used as a rat run off these roads. Send Road was never intended to be used by today’s very large articulated trucks.

The essential traffic islands to enable pedestrians to cross represent an additional hazard plus the increasing number of cyclists exposed to rising levels of exhaust pollution.

Access from the opposite end of Tannery Lane is through very narrow roads with limited passing areas which will render this access effectively impossible. This means that traffic from the Marina and the Clockbarn Nursery site would be forced to come and go via the Send Road junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3604  Respondent: 17419297 / Nick Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the Garlick’s Arch (A43) proposed changes to this site which in combination would generate considerable activity in a most unsuitable location.

Pitches designated for Show People suggests large vehicle traffic movements and a further extension to the commercial premises that have already been added on that side of the road all of which is located in close proximity to the surrounding residential area.

Increasing the number of houses would mean a truly massive increase in the volume of traffic which will only be able to use the A3, Send Road and travelling through Ripley, all of which are unsuitable for the level of traffic associated with such a development.

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause log jams of these villages.

Garlick’s Arch (A43) should not be extended or even developed with the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Show people sites in A34 Garlick’s Arch

The allocation of 6 Travelling Show people plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Show people plots in A43 Garlick’s Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3605  Respondent: 17419297 / Nick Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

I further object to the Garlicks Arch site because if A58 Burt Common site and development at Gosden Hill Farm is also granted then the A3 corridor from Burpham to Ripley will be over developed and it will simply join up a sprawling set of developments. These in turn will lead to greater traffic density, slower journey times as well as increasing safety concerns for an infrastructure which cannot support this level of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/479  Respondent: 17419553 / Tamsyn de Oliveira  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am firstly in support of the removal of Site A46 and Site A47. I support their removal due to the inability of the current infrastructure to cope with developments of this magnitude - due to the effect on roads, waste, sewage, flooding electric and gas supply as well as access to healthcare having not been properly assessed.

I was also disappointed to learn that you simply wish to remove certain areas from the Green Belt. These areas are Guildford Road, Northern End of Glaziers Lane, Flexford, Walden Cottages & Palm House Nurseries. This is not acceptable. This will lead to a much higher density of development within this area as well as an increase in applications. I am surprised that on the one hand applications are correctly refused as they are in the green belt, but on the other hand - that the council can just amend the Green Belt line 'to suit', without providing any justification or special circumstances as required by their applicants. There are other sites out of the green belt that the council must look at using as an alternative. The Green Belt was created for a purpose - and will lose all importance if we can just amend it to suit our needs.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3614  Respondent: 17419617 / Janice Pickford  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Directs more office space to an extended business park (policy E4) which will increase peak time congestion and encourage rat-running through residential areas which is already a major problem. Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development (2.14a). Adds to air pollution in neighbouring areas, which already exceeds safe EU limits for Nitrous Oxide.

Disregards an independent landscape study which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review (4.3.8)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/605  Respondent: 17419649 / Fiona Angus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the GBC Proposed Submission Local Plan particularly the changes relating to Ripley and Send.

I object to he proposal for a waste management facility in green belt and he associated adverse increase in heavy goods vehicles through the villages of Clandon and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp173/606  Respondent: 17419649 / Fiona Angus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is grossly unfair that around 40% of the proposed new homes in the plan are within 3 miles of Send Marsh. The allocation of new homes needs to be rethought and spread more fairly Round the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3615  Respondent: 17419649 / Fiona Angus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing again to the council to object to the inclusion of A35 Three Farms Meadows in the draft local plan.

I object for the following reasons:

1 it is next to one of the most congested rounds in the country and will result in the area being gridlocked with traffic and an unacceptable deterioration in traffic issues in the village of Ripley. Many of the residents would use their cars to travel to work or drive to Woking result in serious issues in Ripley Newark lane.

2 it is also opposite Wisley garden which is a very popular visitor attraction. They are proposing to increase visitor numbers by 500,000 which in combination with this proposed development will result in the entire area becoming gridlocked.

3 I object that the council has not removed this development from the plan. This overdevelopment on green belt has been repeatedly turned down and the council has received thousands of objections from residents. The high number of houses is totally unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1936  Respondent: 17419649 / Fiona Angus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a waste management facility in green belt and the associated adverse increase in heavy goods vehicles through the villages of Clandon and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/481  Respondent: 17419681 / Chris Smith-Keary  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly may I say thank you for your consideration of Site A46 and the removal of 1100 homes and school from this area. As a resident of Normandy this decision is much appreciated as it would have had a massive impact on what is a small village.

I am also all too aware of the need to provide housing throughout the country and our area must, like others, take it’s share of the responsibility. The proposal of 10,000 homes within a 10 mile radius of Normandy still sounds a lot but spread out over some 300 square miles is somewhat more palatable.

I would, as a resident of Normandy like to make a couple of suggestions for changes to the existing infrastructure as these homes start to come on line.

The first is Ash Station. For some reason when a train comes the barriers seem to be down for a huge amount of time before the appearance of any train. This presumably is a health and safety regulation but at peak times the knock on affect is to cause traffic to queue back past the junction of the A323 and A324 and further down each of these roads. With the proposed additional housing in the area and the corresponding increase of traffic this can only get worse and is an issue that I feel needs to be addressed whilst proposals are being put forward.

The second area is Puttenham Hill and the turning to the Farnham bound side of the A31. Over the years there have been various attempts to ease the congestion at this junction, sadly none of which have succeeded. Again, as with Ash station, the increasing volume of traffic with the proposed development would indicate that this junction is only going to get worse and the queues even longer.

The third area cyclists. This area has an ever increasing volume of cyclists on what can only be termed narrow roads. These roads are obviously pleasant to cycle on and cars, lorries, buses and cyclists need to get along so that all may enjoy the roads. If the proposal for extra homes is to go ahead it would be helpful to incorporate plans before any building takes place of a suitable system where vehicles and cyclists can co exist without safety being compromised. I am no planner but could we not be a centre of excellence for such provision? Use the fact for advertising our County?
Thank you again for your time in reading this letter. I know that backs are against the wall in terms of finance (tell me I am a teacher!) but we have an opportunity to do good on a very large scale. Let’s not squander the opportunity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/482  Respondent: 17419777 / Nick Powell  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt, Policy 2 at paragraph 4.3.15 that Send Business Park is now taken out of the Green Belt. Tannery Lane has restricted vehicle access in both directions and further development at this site detracts from the openness of the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1830  Respondent: 17419841 / Andrea Fairbairn  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as the Burnt Common Triangle, currently in the Green Belt are inappropriate for heavy industry.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1795  Respondent: 17419841 / Andrea Fairbairn  Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1822  Respondent: 17419841 / Andrea Fairbairn  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests - how development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1826  Respondent: 17419841 / Andrea Fairbairn  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since the restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51 a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites - Blackwell Farm, Wisley Airfield and Gosden Hill Farm - are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1794  Respondent: 17419841 / Andrea Fairbairn  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (Verified by professional analyst Neil MacDonald of NMSS who concluded than an annual housing figure of 400 per year would meet Guildford’s overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3618  Respondent: 17422753 / Carol Middleton  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond.

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of Policy 29 commences.

Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. a) The Street in Tongham
2. b) A331 / A323 intersection
3. c) A31 / White Lane junction

Ash Green is not part of the Ash and Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond.

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:

Comment ID: pslp171/1796  Respondent: 17422753 / Carol Middleton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

4.3.29 Amend: Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

Attached documents:
I object to policy A42 changes at Clockbarn in Tannery Lane because:
The revised proposal to increase the development by 33% makes a mockery of THE GREEN BELT. The site is part of the permanent GREEN BELT at Send and should remain undeveloped in order to preserve the amenity of the surrounding area. Any development will create URBAN SPRAWL along the Wey Navigation and have a very negative effect on this asset of Guildford Borough. The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical. Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic. Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable.

The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

There is no need for housing on this site; the local plan housing target is incorrect. The figures quoted way exceed the local need; the local requirements are for social housing and not large executive boxes as favoured by developers to maximize profits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3621  Respondent: 17422881 / Valerie Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This land is GREEN BELT it contains two areas of ancient woodland.

The ancient woodland on the site has protection under the NPPF section 118 if one locates a development of this size adjacent to woods it can not fail to damage it. I do realise the policy does allow exception for thing of national importance, but this certainly fails to meet that standard. A UK wide state of nature survey undertaken in 2016 shows worrying trends, so Surrey Wildlife Trust landscape manager Mile Waite undertook a state of nature survey in Surrey and this showed that Surreys flora and fauna appears to be fairing particularly badly with losses far higher than the national level – 12% compared nationally 2%. Of a total of 404 priority species of national conservation concern almost 31% are locally extinct in Surrey while 37% are threatened or in worrying decline leaving 32% considered stable or recovering. The proposed development will not improve the situation it would have a negative effect.

50% of the site is subject to flooding and is recognised locally as a FLOOD PLANE (see attached photographs), it carries a flood zone 2 allocation any work carried out to reduce the area flooded would increase the likely hood of flooding in Send Marsh, the Environment Agency undertook work a few years ago in Send Marsh to reduce the risk, but any work on Garlick’s Arch could neutralise the good work done.

If the proposed development of 400 houses and 6 travelling show peoples’ plots were built where will their surface water go, will it just be spirited away, it will certainly not soak into the ground under such a density of buildings.

The proposal for 400 homes totally ignores the thousands of previous objections made by local people, and there is no proven demand for travelling show peoples plots in this location.
This proposal in addition to the other developments proposed will create an urban corridor the A3 which is completely against the whole principal of the GREEN BELT which was enacted to stop urban sprawl; it would also go against the government’s claim that the GREEN BELT is safe in their hands.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3622  Respondent: 17422881 / Valerie Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT TO A58 at Burnt Common because: this site was deleted from the 2014 Local Plan due to objections yet put back into the 2016 Plan this current proposal looks too increase the development above the 7,000 square meters of warehouse or industrial units proposed in the 2016 Local Plan. There is currently no requirement for more industrial units. Guildford and Slyfield currently have empty sites and there is a decline in the demand for such sites, the 2017 employment land need assessment shows a reduction in demand to 3.9 hectares for the whole borough, yet the council are proposing to destroy 10 hectares of Sends GREEN BELT for unnecessary units putting even more pressure on the local roads and adding to the development along the A3 corridor totally against the GREEN BELT policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1797  Respondent: 17422881 / Valerie Golding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the proposal to inset Send Business Park from the GREEN BELT because: this would enable the development to grow which would be totally out of keeping with the rural location, this old no conforming use is located on one of Guildford Borough’s jewels, the Wey Navigation, and any development would be very detrimental to it. Access to the site from the A247 is by a very narrow lane just one vehicle wide far more suitable for a horse and cart than a forty-four-ton HGV. Any development at this point would detract from the openness of the land (GREEN BELT) around the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence between the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green Village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond."

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval house and should be amended as follows:

"Sensitive design at site boundaries with adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. a) The Street in Tongham
2. b) A331 / A323 intersection
3. c) A31 / White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location.

The properties along Ash Green Road form part of Ash Green Village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond."

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval house and should be amended as follows:
"Sensitive design at site boundaries with adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

Attached documents:

Comment ID: pslp171/1820  Respondent: 17423617 / David Middleton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

- **4.3.29 Amend:** "Originally consisting of the three small rural villages of Ash, Ash Vale, and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

- **4.3.30 Amend:** "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

- **Policy P3 Amend:** (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale, and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

Attached documents:

Comment ID: pslp172/3639  Respondent: 17423713 / Tina Grear  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Page 2804 of 2988
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   ◦ The associated traffic increase from the RHS has not been taken into account.
   ◦ The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
12. Opportunity (3) should be common to all sites and is not unique to this site.
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
16. I object to the removal of additional 3.1 ha from the green belt without any justification.
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. Indeed, in ordinary words and common language, I believe that this draft local plan, and these revisions, in totality, but in particular relating to Three Farm Meadows are “bonkers”!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3643  Respondent: 17424065 / Hugh Grear  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account.

8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.

12. Opportunity (3) should be common to all sites and is not unique to this site.

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

16. I object to the removal of additional 3.1 ha from the green belt without any justification.

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. Indeed, in ordinary words and common language, I believe that this draft local plan, and these revisions, in totality, but in particular relating to Three Farm Meadows are “bonkers”!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/339  Respondent: 17424065 / Hugh Grear  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to the revised Draft Local Plan. I objected before and I maintain that objection. It is my view that the submission plan is unsound due to the large number of errors in the plan, the poor quality and lack of transparency in the evidence base, the accessibility of the evidence base, including the fact that huge files have again been used and these are not accessible to those with poor internet connections. There is also considerable lack of clarity.

I don’t believe that GBC have used the right process, as it is clear to me that there have been significant changes in many material aspects, yet they have used the more limited consultation as if the changes were minor. This is either a huge error of judgement, or an intention to marginalise the local people from the process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/489  Respondent: 17424097 / Marwan Khalek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Finally I would like to object to the removal of Send Business Park from the Green Belt. The surrounding area is outstanding countryside and includes the beautiful Wey navigation, which would be threatened by such a proposal. Additionally road networks that surround the business park are not sustainable for further development, in particular the restricted vehicular access along Tannery lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3644  Respondent: 17424097 / Marwan Khalek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 33% increase in homes proposed with the change to Policy A42 at Clockburn in Tannery Lane. This increase comes despite numerous objections to the original plan for 45 houses, which has been responded to merely by increasing this number to 60. Current traffic problems and access issues in Tannery lane and at the A247 junction will be worsened by this proposal as will the current surface water flooding. Furthermore this proposal will increase the erosion of Send’s greenbelt and will have a negative impact on the open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3645  Respondent: 17424097 / Marwan Khalek  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43, which has changed to include 6 Travelling Showpeople plots despite no evidence to demonstrate a demand for these in this area. Furthermore this policy would involve the destruction of Green Belt despite there being no ‘exceptional circumstances’ for doing so and the fact that this ancient woodland dates back over 400 years and includes trees protected by Tree Preservation Orders. Additionally the implementation of this policy will put strain on both the local transport networks and infrastructure including schools and medical facilities in Ripley and Send, which are not large enough to deal with this increased pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp172/3646  **Respondent:** 17424097 / Marwan Khalek  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate?</th>
<th>, is Sound?</th>
<th>, is Legally Compliant?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Answer (if comment is on questions 1-7 of the questionnaire):**

I object to the introduction of **Policy A58**. The creation of “a minimum of 7,000 sqm” of industrial and/or warehouse development in the Burnt Common area is an unnecessary destruction of Green Belt land given the recent decline for industrial land and the empty sites located in Guildford and Slyfield. The existence of Green Belt is to prevent the unrestricted sprawl of urban developments as well as to stop the merging of neighbouring villages and towns. However this plan would join up existing villages, thus defeating these aims. Additionally such a development would cause strain on the small surrounding roads of Ripley and Send, many of which are narrow country lanes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3647  **Respondent:** 17424161 / Georgia Pask  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate?</th>
<th>, is Sound?</th>
<th>, is Legally Compliant?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Answer (if comment is on questions 1-7 of the questionnaire):**

I have already objected to the proposed development at Three Farm Meadows. I am now contacting you to object to the proposed changes to the Guildford Borough Council Local Plan as it affects that site (policy A35). The submission plan is, in my view, unclear, unreliable and unsound and contains a significant number of errors. In particular, I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

In my view, the significant modifications being made to the plan mean that it is inappropriate to have a regulation 19 consultation – I note that no clear explanation has been provided by the council as to why it considers it to be appropriate. In addition, the Council appears to be wasting tax payers money and residents time and money as a result of not flowing due process and ignoring previous representations.

I remain opposed to the inclusion of Three Farms Meadow (A35) in the draft Local plan for the reasons set out in my email last year. I would reiterate that Three Farm Meadows is a Green Belt Site of more than 60% agricultural land alongside meadows which are natural habitat for badgers, bats and protected species. It is also a site of Natural Conservation Interest and home to three species of RBPB ‘red list’ birds which are on the ‘at risk’ register. There can be no doubt that the proposed development would significantly change air quality for the worse.

Please ensure that this email, together with my original comments on the proposed development are passed on to the relevant inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Having expressed my concerns previously I am writing as a concerned sibling of a West Horsley resident regarding the latest changes made to the Guildford Borough Proposed Submission Local Plan June 2017 consultation.

My overriding concern is that it would appear that no change is being proposed with regard to the idea of insetting West and East Horsley from the Green Belt thus risking the beautiful countryside of the two Parishes being swallowed up by the Metropolitan Sprawl. The reduction in the number of new homes being proposed for West Horsley is to be welcomed but there appears to be little evidence of a realistic reduction in the overall number of homes being proposed or indeed introducing a fair balance in the number of new homes in the Borough - at present it appears that the Eastern side of the Borough is being targeted with an unfair proportion of new homes compared with the Western side.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

There also appears to be no proposal to introduce commensurate infrastructure upgrades e.g. medical, educational and transport services to cope with the increased number of residents. Furthermore the proposed Wisley Airfield redevelopment is a step too far.

It is also puzzling that like a lot of other Borough and District Councils in Surrey, the number of new homes proposed in the Guilford Borough Plan well exceeds the numbers required by HM Government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3393</th>
<th>Respondent: 17424705 / Keith Brothwell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to building 45 houses at Clockbarn Nurseries because of inadequate access and traffic volumes ( please see below).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3392</th>
<th>Respondent: 17424705 / Keith Brothwell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to building 400 houses and 7000 sq. metres of industrial space at Garlick’s Arch. Please see below for detailed reasons.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3395</th>
<th>Respondent: 17424705 / Keith Brothwell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Answer (if comment is on questions 1-7 of the questionnaire): ()

I **object** to the new interchange with the A3 at Burnt Common in its currently proposed form. There is no mention of improvements to local road infrastructure as a dependency on this proposal. Local roads through Send and Ripley are already heavily congested with pipeline plans leading to further volumes. Traffic already queues at peak periods as existing roads can scarcely cope with the current levels of traffic. Please see below for more information relating to my object on this issue.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/3394  **Respondent:** 17424705 / Keith Brothwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

---

I **object** to the development of 40 houses and 2 traveller pitches at Send Hill. It is an inappropriate location because of the narrow width single access country road providing insufficient access - please see below for further details on traffic issues. The subsoil of the proposed site contains documented unsafe landfill waste registered at GBC. Any development there would spoil beautiful and historic countryside including the ‘five manors of Send’ which are a matter of historic record.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/7484  **Respondent:** 17424705 / Keith Brothwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
The future of Guildford borough:

The local plan seeks alignment with the council’s corporate plan 2015-20 which establishes the ambition for Guildford to be ‘a town and rural borough that is the most desirable place to live, work and visit in South East England.’ It goes on to say that ‘we want Guildford to be a centre for education, healthcare innovative and cutting edge businesses, high quality retail and wellbeing...’ This plan does not seek to fulfill the above intentions as it aims to provide low cost housing and industrial units (supporting a town which has rejected high quality retail development in favour of low status anchor tenancy for shopping centres in the future – to the dismay of many residents and council tax payers).

Mixed housing

Guildford’s housing requirements seem confusing as the basis for calculations has not been disclosed. Guildford attracts and maintains a mature and more wealthy citizen. Whilst the aim to provide housing for the younger generation is of course essential and well intentioned there does not seem to be any correlation between the proposed future prosperity of the borough and the looked for increase of workers in the borough doing the jobs and earning the wages we see advertised. I worry that older, wealthier people will move out as a result of the changes proposed and be replaced by low paid individuals who will be less able to contribute to the overall economic sustainability of the borough. There is a lack of information concerning the jobs and work that would be undertaken and mention of employment by local hospitals and care homes is clearly a statement of intention to attract low paid workers requiring very low cost housing.

Policy H1 of the Local Plan (Homes for all) sets out to ensure new development provides a mix of housing tenures/types/sizes, appropriate to the site size, characteristics and location, with a view to meeting the accommodation needs established by the latest Strategic Housing Market Assessment (SHMA). It says that as well as the benefits it can provide to people’s lives, families and communities, suitably sized, priced and located housing can also help to support the economy by ensuring people with a wide variety of occupations can live in the borough. I refer to comments above concerning the availability of jobs and their wages in order to affirm this aspiration. Is there any assurance that the houses proposed will be low cost? (This is not the usual experience in the borough nor of the intentions of developers as can be seen by very recent small development within Ripley and Send. New cottages built in Newark Lane cost in excess of £half million and new houses at Skeens Lane in Send have been marketed for £690,000 - http://www.rightmove.co.uk/house-prices/Send.html)

A large area of low cost housing suitable for low paid residents does not fulfill the aspiration of supporting the economy.

Policy D4 (Development in urban areas and inset villages) requires that: “proposals for new development within inset village areas will have particular regard to: the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape; important views of the village from the surrounding landscape and views within the village of local landmarks.” As previously mentioned this proposal does not fulfill this requirement particularly in the area of the distinctive settlement pattern of the village.

The SA details that where developers demonstrate that providing the amount of affordable housing required by policy would not be economically viable, the Council will follow the following cascade mechanism to assist with delivering a scheme: 1) vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; 2) reduce the overall number of affordable homes. The door appears to be wide open for the council to move against its stated local plan provisions in order to allow future developers to demonstrate that ‘affordable housing’ is not actually economically viable and that they should be permitted to make more money by building larger houses. What is actually the driving force behind these proposals? Without this knowledge I object most strongly. The SA concludes that there remains some uncertainty regarding delivery of an appropriate housing mix more generally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GP Surgery access

The SA states with regard to GP Surgery access that there ‘is little potential to conclude on the ability of surgeries to accept additional patients or expand.’ The surgery is already heavily subscribed. Pressures on local GPs are mounting as other national considerations take hold. The SA continues by stating that ‘the proposed allocation at Send Marsh / Burnt Common (400 homes) potentially stands out as being some distance from a GP surgery.’ The plan does not contain any firm commitment for sustainable transport from the proposed development areas to GP surgeries, should there be room for the large number of young people expected to take up residence (400 x 3 people per house = 1200 new patients).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7481  Respondent: 17424705 / Keith Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposals for the above developments

I object to Send and Ripley villages being removed from the Green Belt with regard to the proposals identified by the Local Plan. Please see below for detailed reasons.

Local Councillors and central government gave a clear election promise to protect the green belt. This reneges on it. I particularly voted in accordance with my wish to preserve the green belt and to ensure that Guildford council had good representation in it. I feel let down by my local government when I read these proposals. I choose to live in this area and make a contribution to it (I was not born or brought up here) as I have valued the semi-rural nature and convenience of the landscape but should these proposals go forward I will move out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7483  Respondent: 17424705 / Keith Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
The Sustainability Appraisal (SA) of the Guildford Local Plan has clear mention of the above developments and these form the heart of my objections as follows:

Loss of the Green Belt

My most important objection is the removal of the villages of Send and Ripley (and other surrounding villages) from the Green Belt. This was a particular electoral objective of mine. I am not alone as I know that other nearby boroughs have expressed concern at some of Guildford’s plans.

The Green Belt was intended to be permanent, as required by the National Planning Policy Framework, and there are no special circumstances to justify abandoning it. Send and Ripley’s green belt provide an essential buffer stopping Woking and Guildford becoming one sprawling area.

The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. It feels that my local borough considers Green Belt issues to be at the bottom of their priorities despite the feelings of their electorate.

The Corporate Plan identifies a series of themes for action including:

- Our Infrastructure - working with partners to deliver the massive improvements needed in the next 20 years, including changes to tackle congestion issues – this proposal does not fulfil this
- Our Environment - improving sustainability and protecting our countryside, balancing this with the needs of the rural and wider economy – this proposal decreases sustainability locally, and destroys valuable rural amenities while not evidencing any benefits to the wider economy.

The plan promises to ‘support and expand the economic vitality of our rural areas whilst protecting existing heritage, landscape and character. This proposal does not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7487  Respondent: 17424705 / Keith Brothwell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Loss of agricultural land

The plan will result in significant loss of agricultural land, including significant loss of land that is grade 3a quality and therefore classified as ‘best and most versatile’ in the national context. On this basis, the SA says that it is appropriate to predict significant negative effects. Agricultural growth may well be a priority for the UK following Brexit and it would seem sensible to avoid destroying valuable land providing employment and economic growth until the future is better understood. Investment in such areas would seem more appropriate at this time. A UK prime agricultural college sits very close to the proposed developments in the local plan (Merrist Wood) and some mention of it would seem logical and desirable with regard to these proposed developments.

I look forward to it, but object most strongly to the plans in their current form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The SA notes that another important consideration is the potential for increased traffic to impact on **historic character within Conservation Areas**; It states that it is difficult to draw strong conclusions in the absence of detailed modelling work. Should this not be a pre-cursor to any plan? An issue of particular importance it notes is that there is **likely to be an increase in traffic through the Ripley Green and Ockham Conservation Areas** (the former being associated with a high concentration of listed buildings)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3680</th>
<th>Respondent:</th>
<th>17424705 / Keith Brothwell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the policy A42 because I wish our village to remain in the Green belt and this plan alters that situation.

The increase in homes from 45 to 60 seems like far too much for the area and it ignores all the previous objections which have been made by local people in the village.

The traffic at the Tannery Lane junction and the main road (A247) is already bad as this is a difficult junction to exit - the proposals can only make matters far worse.

This area is subject to flooding - there is a flood plain nearby- The proposal does not contain good plans for removal of surface water.

This village benefits from the Wey Navigation Canal and its open countryside is an asset. So many houses will mar the views which attract tourism on the canal to the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3682</th>
<th>Respondent:</th>
<th>17424705 / Keith Brothwell</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I object to the policy A43 very strongly.

I wish our village to remain in the Green Belt and I cannot see any 'exceptional circumstances' which might enable the council to consider removing us. Living here and purchasing a home here was because of the Green Belt protection to our wonderful countryside. Ripley and Send/Burnt Common are distinct village areas. This proposal tries to link them up resulting in a semi-urban sprawl which goes against the policy of the Green Belt.

Local villagers have already made strong objections which appear to have been ignored! There is no proven demand for Travelling Showpeople plots in this location.

The number of houses proposed for our village needs is excessive and will cause huge over development of our area. The road networks are already extremely busy and this proposal will result in a huge increase of traffic. Local roads and junctions with the main A3 simply will not cope with the extra influx. Additional traffic jams will result causing untold delays and inconvenience to people trying to commute to London or deliver children to local schools.

The area is subject to flooding (it is currently a flood zone 2 area) - further development will only make matters worse.

The area in question has been used over many years for shooting and the land is contaminated by lead shot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3683  Respondent: 17424705 / Keith Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 at Burnt Common - this was deleted from an earlier draft (in 2014) because of all the objections made. Why is it suddenly back on the agenda?

There has been a decline in the demand for industrial land since the first proposal - yet I note that what was proposed as a maximum number in the original plan is now a minimum number!! Reduction in need was demonstrates in the 2017 Employment Land Need Assessment - we do not need this huge over allocation of land in our Green Belt.

There are empty sites and industrial units at both Slyfield and Guildford which surely need filling before any further industrial expansion is proposed? I strongly wish our villages to remain in the Green Belt and do not believe there is a need to ruin the area by increasing the industrial property available.

As stated above this proposal aims to link up two distinct village areas which is against the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1866  Respondent: 17424705 / Keith Brothwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because this will adversely affect the nature of the surrounding countryside situated so close to the Wey Navigation. Expansion and development of this area goes against Green Belt intentions regarding the openness of the countryside. It is inappropriate.

Access along Tannery Lane is very difficult in both directions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3688  Respondent: 17424737 / Angela Hicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A35 Former Wisley Airfield

Site increase to 95.9 hectares

I object to the proposal to increase the area to 95.9 hectares because:

The building of what is virtually a New Town will result in a volume of traffic which will gridlock our already overcrowded local roads and raise the pollution levels which are already above safe limits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3686  Respondent: 17424737 / Angela Hicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A43 Land at Garlick's Arch, Send Marsh

Now 400 homes and 6 Travelling Show People plot.

I object to the Policy A43 change at Garlick's Arch because:

This policy ignores the fact that there is no proven demand for Travelling Show people plots in this location.

It is situated in beautiful permanent; Green Belt and no "exceptional circumstances" exist. The area is ancient woodland in existence since the reign of Elizabeth I.

It will cause over-development of Send village and consequent congestion on the roads and join up Send to Ripley with consequent defeat of the object of the Green Belt.

It is subject to frequent flooding and is currently a flood zone 2 allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3687  Respondent: 17424737 / Angela Hicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A58 Land at Burnt Common, London Road

Now a New allocation for a minimum of 7,000 sq.m. of industrial warehousing.

I object to Policy A58 at Burnt Common because:

It was deleted from the 2014 draft because of all the objections made previously.

The word "minimum" is a change from the previous "maximum" in the 2016 plan and since that time there has been a decline in demand for industrial land.

There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.

As with A43 above, the policy will cause small local roads creating traffic gridlock and defeat the object of the Green Belt.

A Waste Management Site is briefly mentioned in policy 4.4.23a and does not allow for proper full and proper consultation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the proposal to inset Send Business Park from the Green Belt because:

It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.

There is highly restricted vehicular access along Tannery Lane in both directions.

Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

*Policy A25 - Gosden Hill Farm*

I have previously objected to the previous intention to construct 2,000 homes on this site and consider that the new Plan’s proposal to reduce the number of dwellings to 1,700 homes would not materially reduce the very detrimental impact that the scheme would have upon the A3 and other local roads. I object to this revised proposal on the grounds that the number
of houses proposed for this area is still far too high and, unless the development is totally concealed from the A3, it would
detrimentally affect the appearance of the borough as a predominantly rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3692  Respondent: 17424801 / Gregory Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Policy A43 - Garlick’s Arch

I have previously objected to the proposed development of 400 houses on this Green Belt and good agricultural land. The
new policy A43 adds 8 travelling/showpeople pitches to this development rendering the policy even more inappropriate for
the area. The Borough Council is reminded that less than 3 years ago it refused a planning application from ‘Oldlands’ to
build just 25 houses in the same location. The Council cannot therefore incorporate this policy within the Plan and still
maintain that it applies consistent and good practice.

This policy would increase the population of the Send Marsh/Burnt Common village by 49% and totally destroy its rural
character.

I therefore strongly object to the revised proposal on the grounds that;

1. the village has no shops or other infrastructure to support the development;
2. the additional traffic generated would create major congestion on the already busy roads throughout the villages
   of Send, Send Marsh/Burnt Common and Ripley;
3. no ‘exceptional circumstances’ exist to destroy this Green Belt land or the ancient woodland it contains;
4. there is no proven demand for travelling/showpeople pitches in this location, and
5. it would join up and destroy the distinct character of the villages of Send Marsh/Burnt Common and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3691  Respondent: 17424801 / Gregory Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• New policy A58 – Land around Burnt Common warehouse, London Road, Send P2 and A58).

I have previously objected to the proposed enclosure of huge areas of Green Belt open space within ‘inset boundaries’ around the villages of Send and Send Marsh/Burnt Common where there will be a presumption in favour of development. The new policy A58 seeks to increase the area of land to be extracted from the Green Belt for a minimum of 7,000 sq.m of ‘employment floorspace’.

I therefore object to this proposal on the grounds that there is no proven need to allocate any Green Belt land within the Borough for industrial/warehouse development and the fact that, at this particular location, it would have a very severe and adverse environmental impact not only on the two villages, but throughout the whole surrounding area, overdeveloping the local rural communities and creating major traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1877  Respondent: 17424801 / Gregory Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Policy S2 - The 12,426 (654 per year) number of homes that the Plan intends to deliver over the 19 year period 2015-2034.

Although the target for housing has now been reduced from 693 to 654 per year, it is still far too high and fails to take account of the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

I therefore object to the calculation of assessed need for housing and other development in the area and the grossly disproportionate impact of the Local Plan’s proposals on its more northerly communities of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/344  Respondent: 17424801 / Gregory Webb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am very disappointed to see that despite the massive number of valid objections raised by our villages’ local residents within the 2016 consultation, the Borough Council has deemed it fitting to increase the housing, travelling/showpeople pitches and industrial development allocations in the villages despite a reduction in the borough’s overall target.

With the proposed proposals for 3,700 homes at Gosden Hill Farm and Wisley airfield (Policy A35) in the immediate vicinity and the specific proposals for the villages of Send and Send Marsh/ Burnt Common to accommodate an extra 500 houses, 10 travellers pitches, 7,000+ sq.m of industrial development and slip roads to the A3, I hereby strongly object to every single one of these proposals on the grounds of their severe and adverse environmental (including atmospheric pollution from the increased traffic) impact and the unjustified sacrifice of prime agricultural Green Belt land and historic woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3703  Respondent: 17424865 / Richard Stott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object once again (3rd Time ) to any development of the site referenced above for the following reasons :-

a) It will generate over 4000 traffic movements a day . I presume Guildford Council reads the daily news reports that the rest of the World is trying to reduce pollution and protect an already damaged environment ? This development will create traffic , noise and pollution precisely through its location , and this is totally unacceptable in the World today
b) It will require additional schools , medical facilities and policing to support the community, which cannot even be adequately provided in the local area at present , so why create more demand through this development, when there are no funds for the existing local Authority services ?
c) The site is Green Belt and should not be developed on, and the roads are already congested and cannot support any increased traffic.(The A3 and the M25 are permanently jammed with traffic ).Furthermore there are no funds to maintain the roads if they are built, and some of the surrounding Councils cannot even repair the existing roads
d) When this application was originally proposed we didn't have Brexit which apparently inter alia is expected to reduce EU immigration. If we no longer have so many people coming into the UK every year, there presumably won't be a short term pressing need to build as many houses, and even less of a reason to destroy the countryside to build the additional housing as proposed in this application

Hopefully the application will finally be rejected so we don't waste further time and money on this, when there are so many more important issues like providing better education in the schools , reducing class sizes , and investing in our teaching , medical and policing staff .

I believe the Planning process needs reforming so that the environment can be protected for the long term and against short term development . Perhaps the Government should also bring in Development Land Tax which most European Countries already successfully apply .

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp173/496</th>
<th>Respondent: 17424897 / Peter Sanderson-Byrne</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3710</th>
<th>Respondent: 17424897 / Peter Sanderson-Byrne</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A34</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

1. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3712</th>
<th>Respondent: 17424897 / Peter Sanderson-Byrne</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
</tr>
</tbody>
</table>
1. I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3715  Respondent: 17424897 / Peter Sanderson-Byrne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

1. I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3707  Respondent: 17424897 / Peter Sanderson-Byrne  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlick’s Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

The Plan is self-inconsistent in respect of traveller sites.
A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots …” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

I object to the hiding of development by “deferment” (A24, A25, A26, A43)

This version of the Plan has concealed some development planned to take place by “deferring” it beyond the period covered by the Local Plan. This is designed to have 2 effects: i) to hide the number of housed actually being built (A24, A25, A26 – total of 1100 deferred, but still being built!), and ii) give an excuse for building houses on another site (A43 – 400/650 houses proposed) when they are not needed.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”
2. The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3711  Respondent: 17424897 / Peter Sanderson-Byrne  Agent:
1. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is not a sustainable strategic site because of the constraints on the site and the physical location.

2. It is further from railway stations than any other identified strategic site.

3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10) and as such, the local roads are at capacity.

4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded roads and will therefore be unreliable and subject to frequent delays.

5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum and the associated traffic increase from the RHS has not been taken into account. Also the regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

7. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

8. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

9. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

10. I object to the removal of additional 3.1 ha from the green belt without any justification

11. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

12. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

14. I object to the fact that there is no clear justification for the removal of one strategic site over site A35 and I also object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

15. I object to the extension of the plan period by 1 year as it has not been identified as a major change

16. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
17. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

19. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

20. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

21. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

22. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/5422  Respondent: 17424993 / Harvey Weller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is not a sustainable strategic site because of the constraints on the site and the physical location.

2. It is further from railway stations than any other identified strategic site.

3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10) and as such, the local roads are at capacity.

4. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded roads and will therefore be unreliable and subject to frequent delays.

5. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

6. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum and the associated traffic increase from the RHS has not been taken into account. Also the...
regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

7. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

8. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

9. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

10. I object to the removal of additional 3.1 ha from the green belt without any justification

11. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

12. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

13. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

14. I object to the fact that there is no clear justification for the removal of one strategic site over site A35 and I also object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

15. I object to the extension of the plan period by 1 year as it has not been identified as a major change

16. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

17. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

19. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

20. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

21. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

22. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

Comment ID:  pslp173/498  Respondent:  17425089 / Clare Punshon  Agent:
I have looked carefully at the new draft Local Plan and I wish to OBJECT for the following reasons.

East Horsley is a small village which does not have the infrastructure of roads, rail, parking, medical facilities or schooling to support such a huge increase in population. Fifty seven percent of new housing proposed is on land that is currently categorised as Green Belt. This is flouting government law which established Green Belt to protect the countryside for future generations.

It is proposed that East Horsley is to be “inset” from the Green Belt. This proposed change in settlement boundaries means that the East Horsley settlement area will increase by 37%. At the moment, one hundred houses are proposed near East Horsley station and over two thousand on the former Wisley Airfield, only about one mile from the East Horsley parish boundary. The site at Wisley has recently been increased to now include two more farms!

While the ONS forecasts population for growth for Guildford at 10.4% over the Local plan period, GBC proposes to increase the housing stock by 22%. Since Brexit, forecasts of increasing population numbers have been reduced, yet GBC are continuing to predict massive increases in population, which quite frankly, does not make sense.

Again, I wish to register my strong opposition to the changes proposed by GBC in their latest draft of the Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1893  **Respondent:** 17425217 / Brian John Thomas Perkins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**General Objections to the Guildford Borough Council Proposed Local Plan (July 2017)**

I object to the amended number of new houses required in the borough as it is still much too high and still cannot be, tested or verified objectively.

I object to the fact that the changes to the Local Plan still requires large numbers of new houses to be built on land currently designated as Green Belt.

I object to the fact that, despite changes, the plan still proposes to remove many villages from the green belt and thus allow unrestricted development in the future.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
<table>
<thead>
<tr>
<th>Comment ID: pslp172/3728</th>
<th>Respondent: 17425377 / Hannah Finning</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy A29: Land to the south and east of Ash and Tongham

The borough is required to build a number of houses within a timeframe but they should not all be in the same area. Houses are slow to sell so where are all the people or the proposed for 1200-1750 homes? This is completely out of character for Ash Green and will lose a beautiful countryside location which is completely contrary to Policy P3 Countryside mentioned above. Any development in this area should be of a size and scale which keeps the intrinsic character and rural character of these sites. The site is just north off the Hogs Back but should be better protected as it is to the south.

As a resident of Ash Green, I believe that Policy A29 Requirement 8 doesn't allow for the right level of protection for the historic Ash Manor, a set of three listed buildings and Ash Grange. More protection should be within the requirements of this policy to prevent developers from spoiling the integrity of these listing buildings. They should not be forced to sit against poorly specified and designed housing estates so something more appropriate is called for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1894</th>
<th>Respondent: 17425377 / Hannah Finning</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Policy P3 Countryside:

Ash Green should not be part of the Ash and Tongham Urban area and should not be made so. The green boundary's should stay in place to allow the villages Ash, Tongham, and Ash Green to remain separate. I live in Ash Manor and historically it has always been part of Ash Green so please do not do anything to move Ash Green, as the current proposal appears to do,
or coalesce Ash, Tongham and Ash Green. The intrinsic character of Ash Green should be kept intact after any development.

Substantial development has been proposed for Ash Green and I believe it is vital that suitable infrastructure is in place before any further development commences. Ash Green Road/Wyke Lane are already used as rat runs when there are problems on the A3/A31 Hogs back and Ash station. These are narrow lanes that cannot take the additional traffic when this happens. The road infrastructure required includes work to the A31/A3 junction at Guildford, A331/A31 junction and improvements around Ash station to alleviate the damage to these lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2778  Respondent: 17425377 / Hannah Finning  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A27, A28 and A29- These policies are not coherent and provide no provision for community. This is both the definition of boundaries between the villages, public spaces and infrastructure. It's disappointing that the plan has nothing for local people but is trying to cover this land in houses leaving us nothing. You have to make it a nice place to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3729  Respondent: 17425473 / Holly Brewer  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
2. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
3. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/501</th>
<th>Respondent: 17425569 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Guildford Town Centre</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to removal of sites A4, Telephone Exchange and A18, Guildford College as they would provide 200 homes in sustainable location, and 100 homes at A33, Broadford Business Park.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3731</th>
<th>Respondent: 17425569 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the removal of this site from Green Belt. It was included at the last minute in the 2016 draft, without justification other than the proposed A3 slip roads.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the proposal of travelling showmen as Ripley already has 4 travellers pitches, with more are proposed on site A35.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3733</th>
<th>Respondent: 17425569 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: pslp172/3734</td>
<td>Respondent: 17425569 / Jack Cross</td>
<td>Agent:</td>
</tr>
<tr>
<td>--------------------------</td>
<td>----------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to removing site A46, 1100 homes, from the draft Plan. Like Wisley it is located in Green Belt but unlike Wisley, it is close to a railway station.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3735</th>
<th>Respondent: 17425569 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to a site providing 5 houses being excluded from the current draft Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1896</th>
<th>Respondent: 17425569 / Jack Cross</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to this site being included as well as Garlicks Arch.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the GBC not adhering to NPPF rules - “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” (NPPF Section 9, paragraph 79).

I object to the extension of site A35 (former Wisley Airfield) and its proposed removal from the Green Belt as it is in the centre of the Metropolitan Green Belt, surrounded by countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/350  Respondent: 17425569 / Jack Cross  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objections to the amended draft 2017 Guildford draft Local Plan are below. I would like confirmation that the comments below, and those previously submitted, will be passed onto the Inspector.

I would like to make clear I am not anti-housing, nor do I believe in “pushing the problems elsewhere”. I believe GBC have a duty to ensure that every town and village needs to provide housing for local people, proportional to its population, in all urban, rural, Green Belt or AONB areas instead of greatly disliked and, in some cases, totally unsustainable sites.

It is unfortunate that GBC have not taken into consideration the unusually large number of comments (32,000) on the 2016 Local Plan. It would be courageous of GBC to review their housing needs in light of the flawed studies they have used and taken into consideration the consequences of the current Brexit climate and inevitable change in housing need. It would be wonderful to say “I agree” instead of “I object”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3737  Respondent: 17425729 / Tony Forrest  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
I am writing to comment on the proposed changes to the above Plan.

Despite what I imagine must be thousands of objection letters to Three Farm Meadows being included as a Strategic Site reviewing the documentation I see that it still listed as a potential site for inclusion.

I know my wife’s concern for this area being considered is from a traffic perspective and inability for the area to sustain this volume of development, to which I wholeheartedly agree but my other concern is that of the green belt, or rather loss of it. There appears to be changes to the green belt boundaries with no justification and which do not appear to have been identified correctly on the Plan. (Appendix H page 16). There is no justification given for the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact. We will also have increased negative impact of the views of the Areas of Outstanding Natural Beauty.

I am aware that this consultation is supposed to be comments just on the changes to the Plan not a reiteration of initial concerns but just in case my strength of feeling is lost – I object strongly to the Three Farm Meadows area, A35, being included on this Plan - our infrastructure does not support it and the unsupported estimated housing needs figures and associated building are threatening to destroy areas of green belt and views unnecessarily.

As you have asked for our opinion please do listen to our concerns and incorporate them in your planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The University has reneged on its promise to supply student accommodation on its own campuses which would free up a proportion of less expensive housing in the town, occupied by students. The Council would benefit from the additional Council Tax income for many years from private individuals; no Council Tax is paid by students.

Development of the Blackwell Farm site will significantly add to the peak time traffic congestion on the A31 and A3 and ignores independent expert traffic studies on the viability of the development (2.14a). Adding a new link road will add to the traffic chaos for commuters which already exists on the A31 and A3 and add to the congestion at the Tesco/Royal Surrey County Hospital roundabout. In the event of a major incident access to the Hospital for ambulances would be severely affected. It is already difficult for patients trying to meet hospital appointment times with the traffic congestion.

Accidents are caused by drivers trying to cut in from the fast lane on the A31 into the lane accessing the A3 when frustrated by delays. There is no hard shoulder on the A31 or A3 as a refuge for drivers or access by emergency vehicles.

Weight should be given to complying with safe European Union limits on the increased air pollution caused by the additional traffic needing access to the development site; the suggestion that employees at the Hospital and the Research Park would be provided with local housing is flawed as the housing would not be affordable, especially for nursing staff.

The air pollution is already evident, especially at peak times when traffic is virtually stationary for many miles along the Hog’s Back; we can see the fumes rolling down the north side of the Hog’s Back; it is worse in winter conditions. The proposed new major route would cut through a belt of ancient woodland and remnants of historic parkland and disrupt wildlife and habitat. The development would affect the European Union’s Thames Basin Heath Special Protection Area for birds such as the Dartford Warbler and Nightjar. There will be significant light pollution in the area.

The proposed development will result in large scale loss of Green Belt, cause irrevocable harm to this beautiful landscape on the edge of the Surrey Hills Area of Outstanding Natural Beauty, contrary to the Government’s intention to protect Green Belt and disregards an independent expert landscape study which demonstrates that part of the site merits AONB status following Natural England’s forthcoming boundary review (para. 4.3.8). When applying for planning approval on Manor Farm, the University advanced an argument that planning should be approved under “exceptional/special circumstances”. It is questionable what “exception/special circumstances” the University would apply to have approval for Blackwell Farm to be removed from Green Belt. Its marketing strategy is to create a “new garden neighbourhood for West Guildford”; it is hard to see how removing such a beautiful landscape will be improved by building on it.

Residents of properties along the Hog’s Back have no provision for safe access/egress on to the A31 with a speed limit of 60 m.p.h. Similarly the latest draft of the Local Plan also removes the provision for an alternative access to Beechcroft Drive and Manor Cottages. The junction is dangerous to all drivers travelling on the A3 and the residents of Beechcroft Drive. I object to the removal of this scheme (SRN6) on safety grounds.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3749</th>
<th>Respondent: 17425889 / Karen Thornton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this revision which now proposes a 33% increase to 60 homes. Tannery Lane is totally unsuitable for the amount of traffic which would be generated, as is the junction with the A247, and there is no sensible reason to justify building on the green belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to the proposed allocation for 400 homes and 6 travelling show people plots. There are no exceptional circumstances to warrant development on the green belt. There are not enough services and infrastructure for housing and show people plots, nor any justification for concentrating 6 of the proposed 8 borough-wide show people plots within Send. The roads in Send are not equipped to deal with the kind of traffic that will be generated by this in Send. It is also subject to flooding and has a flood zone 2 allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

I object to a new allocation of 7,000 sq m of industrial or warehousing which was deleted from the 2015 draft. I also object to the wording of the allocation: the 2016 "maximum" allocation of 7,000 sq m has now been changed to "minimum". There are already surplus industrial premises in the borough with Slyfield and Guildford having empty industrial units and sites, also the need for more industrial/warehousing has not been proven. The road infrastructure is inadequate and there are no exceptional reasons to justify development on the green belt. It will also join up surrounding villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/1897</th>
<th>Respondent: 17425889 / Karen Thornton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development. Further development of this area is inappropriate and detracts from the openess of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/503</th>
<th>Respondent: 17426081 / Robert Yates</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I OBJECT to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-confirming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation.
- There is highly restricted vehicular access along Tannery Lane in both directions.
- Further expansion or development at this location detracts from the openess of the Green Belt and is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3754</th>
<th>Respondent: 17426081 / Robert Yates</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery lane because:

- The increase to 60 homes in place of 45 homes is 33% more and too much
- It ignores all the hundreds of previous objections made by local people
- It will worsen access and traffic problems in Tannery Lane and at the A247 junction.
- It will make erosion of the Green Belt in our village worse.
- It will make surface water flooding, which is already bad, even worse.
- It will impact open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people.
- There is no proven demand for Travelling Showpeople plots in this location.
- It is beautiful permanent Green Belt and no ‘exception circumstances’ exist.
- It will cause over-development of our village and the number of homes is excessive.
- It is exquisite ancient woodland that existed at the time of Elizabeth I.
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation.
- It is contaminated by lead shot accumulated over fifty years.
- It will generate excessive traffic that will block up the local roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously.
- The word 'minimum' is a change from the previous 'maximum' in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt.
- The impact on small surrounding roads will create traffic gridlock.
- It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1910   Respondent: 17426113 / Home Builders Federation (Mark Behrendt)   Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

The policy is unsound because it is ineffective and unjustified

The Council have not provided the necessary evidence to support the implementation of optional building regulations M4(2) and M4(3)(b). Planning Practice Guidance is clear that evidence on both need and viability are required in order to justify the implementation of these optional standards. National Planning Practice Guidance is clear that:

“Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations.” Paragraph: 007 Reference ID: 56-007-20150327

“Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment.” Paragraph: 003 Reference ID: 56-003-20150327

We are therefore concerned that this addition to policy H1 is not justified and should be deleted.

Part 9 of the policy, which relates to self-build and custom housebuilding, will present considerable difficulties in terms of its implementation. The policy refers to the requirement for all developments of 100 homes or more to provide plots for self-build and custom housebuilding. However, this would mean that flatted developments would be required to provide such plots. Clearly it would be unreasonable and impossible for such schemes to meet this policy and the Council must be more specific regarding the scenarios in which this policy will apply. At present developers will not be certain as to the
implications of this policy. Given that paragraph 17 of the NPPF outlines that predictable decision making is a key element of plan making we consider part 9 of policy H1 to be unsound as it is not consistent with national policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/1912   Respondent:  17426113 / Home Builders Federation (Mark Behrendt)   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Council have included the following statement at the end of part 1 of policy H2:

“These will be provided on developments providing solely affordable housing either on public sector owned land or development by registered providers. ”

It is not clear how this statement refers to the preceding sentence which refers to the working with developers and land owners to increase the number of affordable homes. The sentence would appear superfluous to the policy and should be deleted altogether.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/1909   Respondent:  17426113 / Home Builders Federation (Mark Behrendt)   Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The reduction in the housing requirement is unsound because it is not justified.

We are disappointed that the Council has looked to reduce its overall housing requirement by 1400 dwellings in this latest iteration of its plan. The 2017 addendum to the SHMA now indicates that due to changing economic circumstances the Borough’s housing need should be reduced from 693 dpa to 654 dpa.

The consideration of economic factors within any SHMA is to ensure that there is sufficient housing to support the employment growth scenarios set out in the Plan. However, if economic growth is not expected to be as strong as first thought this does not necessarily mean the Council should reduce its housing requirement. Firstly, there is an inherent uncertainty in employment forecasts and as such the NPPG does not require a mechanistic matching of labour supply and
planned housing provision. Consideration needs to be given to the level of job growth elsewhere in the HMA, other neighbouring areas and whether it creates unsustainable commuting patterns. However, it would appear that such considerations have not taken place. The study only examines economic growth scenarios for Guildford and does not consider the implications for the rest of the HMA or, indeed, whether lower growth forecasts are applicable across the HMA. As Planning Practice Guidance sets out that employment trends and growth in working age population should be considered across the HMA, the approach taken by Guildford is not consistent with national policy.

Whilst the Council argues that the economic circumstances show a reduced need for housing, the demographic baseline and affordability issues paint a different picture with regard to housing needs. The baseline level of housing need in the Borough, presented in the 2017 addendum, has risen from 517 dpa to 577 dpa. It must also be remembered that the highest demographic projection using the 10 year migration is 584 dpa.

There is clearly an increasing need for housing within the Borough. The 2017 addendum shows the need for affordable housing has increased from 478 dpa to 517 dpa alongside continued house price inflation of 7.5% per annum over the last 5 years. Indeed, the 2017 addendum highlights this issue in paragraph 5.32 stating that:

“It is clear that house price growth has accelerated in the Borough since mid-2013”

The low levels of housing growth in the Borough, coupled with increasing demand and restricted wage inflation, have contributed to making the Borough unaffordable for many of its residents. As highlighted earlier, over the last five years house price inflation has been at 7.5% yet wage growth over the same period has been slightly less than 1%[1]. Looking over the longer term, average wage growth over the last 15 years has been just over 2% yet house price growth has been 4%. This worsening scenario has led to the situation identified in paragraph 5.27 of the 2017 addendum which indicates that lower quartile house prices are 11.5 times the lower quartile earnings in the Borough. These market signals would suggest the need for a more significant uplift on the latest demographic baseline of 577 dpa rather than the reduction that is being proposed by the Council.

As we stated in our response to the 2016 draft Local Plan, the NPPG sets out the local authorities’ need to consider how past performance will impact on household projections. The 2017 addendum to the SHMA continues to show that the number of households being formed by those between 25 and 34 have reduced. There are clear affordability pressures reducing household formation in this age bracket but poor delivery has compounded this situation. The table below shows that the Council has consistently underperformed against both its South-East Plan target of 422 dpa and its latest assessment of housing need. This underperformance again indicates that the Council should not be looking to reduce its housing requirement in the manner proposed.

[See appendices for Table 1]

Finally, given the growth expectations of London, we are concerned that the addendum dismisses, in paragraph 3.45, any potential increase in migration from London. Whilst we accept there is uncertainty regarding the future dynamics of population flows between Guildford and London, the evidence from the GLA suggest that migration patterns will move towards the rates seen prior to 2008 and the subsequent recession. This would suggest that areas around the Capital, such as Guildford, will see increasing levels of housing need rather than stabilise at current levels. The addendum, at paragraph 3.46, argues that there are no signals that a return is likely since the recovery in 2012. Given that this assumption is based on a single year of evidence we believe limited weight can be attributed to such an argument.

Any reduction in the requirement based solely on economic circumstances would appear to be ignoring wider trends and market signals. We therefore consider the Council’s decision to reduce the housing requirement is not justified and as such makes the policy unsound.

If the Council is to amend its housing requirement on the basis of this evidence (something that should be questioned given that it creates inconsistency in needs assessment across the HMA), then it must consider the evidence as a whole. We would suggest that, as a minimum, the London migration sensitivity analysis should be applied to the latest baseline of 577 dpa. It would then be appropriate to apply a minimum uplift of 20% to this adjusted baseline to take account of the severe affordability issues facing Guildford.

Five-year land supply and housing trajectory
The Plan is unsound as it is ineffective

Firstly, the new paragraph 4.1.9a states that the figures in the Annual Housing Target table sum to 12,426 homes. This statement is not true. The figures sum to 9,810. To sum to 12,426 the target of 654 dpa must be included for the first four years of the Plan period. Whilst this is recognised in the 2017 Addendum to the Land Availability Assessment (LAA) the Council must be clear in the policy and supporting test to ensure that the deficit accrued during this period is properly considered.

We are concerned that the Council has amended the Annual Housing Targets in Policy S1. This now places even greater emphasis on delivery towards the end of the Plan period. This was a concern highlighted in our previous representation. Such an approach means there is a higher risk of the plan failing to meet its housing requirement should any of the major sites being relied on not deliver to schedule. Should this happen it also leaves less time for the Council to address such shortfalls in delivery through its contingency plans. The use of the trajectory in this way appears to be an attempt by the Council to delay delivery and not seek to meet need earlier in the plan. The Council must identify a wider range of sites and in particular smaller sites. The Housing White Paper (HWP) recognised the importance of smaller sites to maintaining consistent supply and we would support the Government’s proposal in the HWP that 10% of all housing allocated should be on sites of less than 0.5ha.

Our concerns regarding the deliverability of the plan are exacerbated given the fact that the Council cannot show a sufficient supply of land for the first 5 years that the plan will be in operation. In the Housing Topic Paper the Council have not stated whether they propose to use the Sedgefield or Liverpool approach to assessing five year supply. However, given the statement in paragraph 4.188 it would appear that the Council will be looking to address backlog over the full plan period (The Liverpool method). This is not the approach favoured in the NPPG. As we stated in our previous assessment, there seems to be little reason why bringing forward allocated sites earlier would create any additional harm.

We would therefore propose that, in accordance with national policy, the Sedgefield method is used to ensure that the backlog is delivered as quickly as possible and not ‘put off’ until later in the plan. We would agree with the Council’s application of the 20% buffer to take account of the persistent under delivery of housing in the Borough.

Applying the Sedgefield methodology from a base of 2019/20 means that the Council will need to address a backlog of 1,319 dwellings between 2019/20 and 2023/24. Based on the trajectory in policy S2 they would need to deliver a total of 3,719 dwellings during that period. As outlined above, and in order to take account of persistent under supply, a 20% buffer would need to be applied. This requires the Council having to identify land to deliver 4,463 new homes in total during this period. The 2017 Addendum to the LAA identifies sufficient supply to deliver 3,582, some 881 homes fewer than required. Even if a 5% buffer were applied (which neither we nor the Council support), there would still be a shortfall of 323 dwellings. This is set out in the table below.

[See appendices for Table 2]

Therefore, when using the Sedgefield methodology even a trajectory skewed towards the later part of the Plan, is not sufficient for the Council to show sufficient supply to meet its requirements during the first five years of the plan. This scenario calls into doubt the effectiveness of the Plan and that, in accordance with paragraph 49 of the NPPF, policy S2 could be considered out of date from the point at which the plan is adopted. As such we believe the plan is unsound as it is not consistent with national policy and nor is it effective as there are serious doubts as to whether it is deliverable over the plan period.

[1] ONS Annual Survey of hours and earnings (NOMIS – June 2017)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Tables.pdf (8 KB)
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

By reducing the housing requirement in the plan to 12,426 new homes the Plan is unsound as the Council have failed to plan positively in relation to meeting the needs of neighbouring authorities.

We continue to have concerns regarding the Guildford Borough Council’s (GBC) co-operation with its partners in the Housing Market Area. Whilst Waverley BC is seeking to meet its needs Woking BC continue to plan on the basis of their Core Strategy. Woking’s Core Strategy sets out its housing requirement as 292 dpa, this is 225 units below the OAN as established in the 2015 West Surrey Strategic Housing Market Assessment. As such there is clearly a significant amount of unmet housing needs within Woking and that consideration needs to be given within the HMA how this unmet need is going to be addressed. This issue was raised by the inspector as part of the examination of the Woking BC Core Strategy. In his report he stated that:

> “Whilst the submitted CS does not plan to meet the objectively assessed housing needs of the Borough, I am mindful that the NPPF indicates that the aspiration to meet housing need is dependent upon consistency with other parts of the Framework. With this in mind and as evidenced by the SA, the Council has considered alternative levels of housing provision, for example, its Option 3 which considered the provision of 594 new dwellings per year.”

As there is still a significant amount of unmet need within the HMA it is therefore surprising that the Council has looked to reduce its plan overall requirement by 1400 homes. This is also an issue considered by the inspector at the recent examination hearings for the Waverley Draft Local Plan. During these hearings the Inspector clearly indicated that he considered it appropriate for Waverley and Guildford to accommodate the unmet need from Woking.

Given these wide spread concerns we would have thought that even if a reduction were appropriate then the Council would have considered the wider needs across the HMA before taking such a decision. Given that the SHMA addendum has been solely commissioned by GBC it would appear that the decision has been made solely on the basis of Guildford’s needs without any consideration of wider needs across the HMA.

The Housing Topic Paper 2017 does consider the issue of unmet need in relation to the reduced housing requirement. However, its position within this topic paper relates to the Council’s consideration as to the relative appropriateness of using specific allocations to address unmet needs from other authorities. In particular the Council focuses on the potential adverse impacts in relation to some allocations. Further deliberation doesn’t appear to have been given to the benefits of meeting the wider housing needs of the HMA given the level of need and significant affordability issues identified in the West Surrey SHMA.

We therefore remain concerned that there continues to be a significant level of unmet need across the HMA. In addition there does not appear to be any commitment from Guildford or Waverley with regard to meeting Woking’s unmet housing needs. In fact it would appear that GBC are seeking to do the opposite by reducing their own housing requirement. This situation was addressed by the Inspector during of the recent examination in public of the Waverley Local Plan. During the hearing the inspector outlined his concern that there was unmet need within the HMA as a result of Woking being unable to meet their housing needs in full. As a result of this concerns he proposed that half of this unmet need, circa 150 dwellings per annum, be met by Waverley. Whilst recognising that the Guildford Local Plan would be examined separately and it would be for that Inspector to draw their own conclusions he suggested that Guildford adopt a similar approach to take account of Woking’s unmet housing need. We would endorse the Inspector’s comments and recommend Guildford increase their housing requirement to include a proportion of Woking’s unmet needs.

As we recommended in our previous response we think that all three Councils should have looked at preparing a joint local plan or, at the very least, had a clear, co-ordinated and shared approach to considering the delivery of sufficient sites to meet housing needs for the HMA. At present this commitment still remains vague and does not indicate that the plan has been positively prepared as required by the NPPF.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1907  Respondent: 17426177 / Antonis Petri  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to express my concerns about the changes (or rather lack of) in respect to POLICY H1 “SELF BUILD AND CUSTOM BUILD”.

I feel the proposed policy is far too restrictive in that it is saying that it expects large housing sites of over 100 homes to provide 5% as self build plots and that the council may require these dwellings to be developed in accordance with an agreed design code.

I believe this, in reality, will only result in self build plots being available on large housing estates and built according to an overly controlling and restrictive design code. This policy is not going to encourage self build as is a far cry from most people’s perceptions of the idea of self build. The government is keen to promote self build and the market is growing but in my opinion this policy is a backward step.

I do not see landowners of smaller sites (less than 100) offering their land for self build plots as the large developers they negotiate with will be wanting to control the whole site for their end product and will not want self build plots forced upon them.

I believe the council should allocate several small sites as dedicated self build sites and allow greater flexibility over design within set parameters.

The Council probably has 250 names on its self build register by now and there is much talk of these larger strategic sites not coming forward in the earlier part of the plan. If these large sites do not get planning in the early part of the plan how is the council going to comply with its duty to grant enough planning permissions for self build by the end of the third base period? It should have a fall back position.

In my opinion the Local Plan needs to build in more flexibility with regards to its self build policy and offer more choice to the self/custom builder.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3760  Respondent: 17426401 / Kate Legge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It ignores all the hundred of previous objections made by local people
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will cause erosion of the Green Belt in our village
- It will increase surface water flooding, which is already a problem and is increasing with further development
- It will impact on the open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3761  Respondent: 17426401 / Kate Legge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is a beautiful permanent Green Belt and no ‘exception circumstances’ exist
- It will cause overdevelopment of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3762  Respondent: 17426401 / Kate Legge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1908</th>
<th>Respondent: 17426401 / Kate Legge</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3766</th>
<th>Respondent: 17426593 / Darren Moss</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3767</th>
<th>Respondent: 17426593 / Darren Moss</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I object to the policy A42 as detailed above because:

The increase to 60 homes in place of the original 45 is more than a 33% increase and far too much for the site and it's ignores all the hundreds of previous objections made by concerned local people.

It will worsen access and increase significantly the traffic issues in Tannery Lane and the A247 Junction.

It will make a erosion of the green belt in our village worse and will increase surface water flooding which is already very bad, even worse in the area.

It will also impact open countryside views from the lovely River way navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the policy A42 as detailed above because:

The increase to 60 homes in place of the original 45 is more than a 33% increase and far too much for the site and it's ignores all the hundreds of previous objections made by concerned local people.

It will worsen access and increase significantly the traffic issues in Tannery Lane and the A247 Junction.

It will make a erosion of the green belt in our village worse and will increase surface water flooding which is already very bad, even worse in the area.

It will also impact open countryside views from the lovely River way navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to the policy A42 as detailed above because:

The increase to 60 homes in place of the original 45 is more than a 33% increase and far too much for the site and it's ignores all the hundreds of previous objections made by concerned local people.

It will worsen access and increase significantly the traffic issues in Tannery Lane and the A247 Junction.

It will make a erosion of the green belt in our village worse and will increase surface water flooding which is already very bad, even worse in the area.

It will also impact open countryside views from the lovely River way navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy A58 at Burnt Common because:

It was deleted originally in the 2014 draft due to objections received. Why has it now been reintroduced?

There is no need to build industrial/warehouse development on green belt land. Nearby at Slyfield and in Guildford there is availability at both these sites there is simply not the demand for this in the area.

The 2017 employment land need assessment showed a reduction in demand to 3.9 hectares for industrial land for the whole borough. Why a need then for over 10 hectares at Send and in green belt land too.

Again this development will impact on traffic in the village and impact on local infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Send Business Park now taken out of the green belt altogether! why?

It is effectively an old on conforming user in an area of outstanding countryside next to the awry Navigation.

The site has heavily restricted vehicle access in both directions in a Tannery a Lane.

Further expansion in this area detracts from the openness of the green belt and is totally inappropriate.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3772  Respondent: 17426657 / Craig Church  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write with reference to the local plan and in particular the changes to the site A43 Land at Garlick's Arch, Send Marsh Burnt Common and Ripley. In section 4.2 Housing Policies, Policy H1 section 7 states:

(7) Accommodation for Gypsy, Traveller or Travelling Showpeople (whether they meet the Planning Policy for Traveller Sites definition or not) accommodation should be provided on development sites of 500 homes or more whilst there remains an identified need. For 500 to 999 homes two pitches or plots should be provided, for 1,000 to 1,499 homes four pitches or plots, for 1,500 to 1,999 homes six pitches or plots and for 2,000 or more homes eight pitches or plots.

The land at Garlick's Arch is proposed to have 400 new homes built on it making it too small a development to include accommodation for travelling show people.

The impact of the 400 new homes (excessive for the size of the site and surrounding area) in the small village of Send and the impact on the traffic on the Portsmouth road can only be made even worse with the addition of the large vehicles, that usually travel in convoy, that are associated with travelling show people.

The future of the area and indeed the whole country is going through a period of extreme change and uncertainty following the country's decision to leave the European union. Foreign investors who bought property and left it standing empty purely because it would increase in percentage value better than any bank interest rate have stopped buying property. There has also been a slowdown in migration into Britain from EU countries. This will reduce the strain on the housing market and hopefully the government will put steps in place to get some of the hundreds of thousands of empty properties in the country available to rent or buy. I strongly believe we should protect our green belt land and keep our villages within it.

There are may steps that can be taken to improve the housing situation without concreting over the south east of England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/505  Respondent: 17426881 / Peter Witting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North
I wish to comment on this local plan in respect of West Horsley.

I wrote to you on 21st September 2014 and also on 17th July 2016 but regretfully never received any response from you so I am repeating much of what I wrote then. I find it entirely unsatisfactory that you have not even bothered to contact me to discuss this site which has the benefit of being in the centre of the village yet hidden away. Please note my email address has changed.

As I do not know where precisely where Cranmore Lane turns into Little Cranmore Lane I shall just refer to both as Cranmore Lane in the following.

I should be grateful if you would consider an additional / alternative development site on land to the east of Overbrook and west of Cranmore Lane. I have spoken to the owner of adjacent Barcombe Farm who would be happy to include his fields between Barcombe Farmhouse and Cranmore Lane within a development area. These areas are shown on the attached plan being land parcels Nos 154 and 136 totalling some 6.769 acres. These should have been identified for possible development in your original study.

This site has the benefit of being in the centre of the village ( ie West Horsley South ) and would round off the village settlement boundary by the recognisable and defensible boundary of Cranmore Lane.

The land involved is very poor quality agricultural land and not being part of a larger holding is uneconomic to farm, and is completely surrounded by other residential housing.

Whilst your study states that this parcel of land has limited access at present a new access to this site would have to be negotiated but there are several possibilities including the demolition of one or two existing houses to make way for such access. An access up the driveway to Barcombe Farm from The Street is also perfectly possible.

This site would NOT be a visual intrusion on the village as it is tucked away behind the Overbrook estate and Fulkes Cottages and bounded by woodland to the East and the South, and cannot be seen from higher ground or other roads.

I am confident that the selection of this site would find more favour within the village than those proposed given that some more development in the village is said to be necessary. Furthermore it could be at a density more appropriate to the village situation rather than the extremely high densities proposed.

Regarding the remainder of the plan I would like to see in it proposals to deal with future medical facilities which are at present overstretched, Increased parking at Horsley Rail Station which is at present full on most weekdays, increased capacity of local schools in order to deal with the proposed increase in population.

I view the plan as being produced at a very high level with less than sufficient consideration to the actualities that exist in a lot of the various locations in the Borough.

I hope I will receive a response from you this time and would be happy to enter into further discussions regarding the inclusion of this suggested site into the final Borough Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/641  Respondent: 17426881 / Peter Witting  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I find it entirely unsatisfactory that you have not even bothered to contact me to discuss this site which has the benefit of being in the centre of the village yet hidden away.

As I do not know where precisely where Cranmore Lane turns into Little Cranmore Lane I shall just refer to both as Cranmore Lane in the following.

I should be grateful if you would consider an additional/ alternative development site on land to the east of Overbrook and west of Cranmore Lane. I have spoken to the owner of adjacent Barcombe Farm who would be happy to include his fields between Barcombe Farmhouse and Cranmore Lane within a development area. These areas are shown on the attached plan being land parcels Nos 154 and 136 totalling some 6.769 acres. These should have been identified for possible development in your original study.

This site has the benefit of being in the centre of the village (ie West Horsley South) and would round off the village settlement boundary by the recognisable and defensible boundary of Cranmore Lane.

The land involved is very poor quality agricultural land and not being part of a larger holding is uneconomic to farm, and is completely surrounded by other residential housing.

Whilst your study states that this parcel of land has limited access at present a new access to this site would have to be negotiated but there are several possibilities including the demolition of one or two existing houses to make way for such access. An access up the driveway to Barcombe Farm from The Street is also perfectly possible.

This site would NOT be a visual intrusion on the village as it is tucked away behind the Overbrook estate and Fulkes Cottages and bounded by woodland to the East and the South, and cannot be seen from higher ground or other roads.

I am confident that the selection of this site would find more favour within the village than those proposed given that some more development in the village is said to be necessary. Furthermore it could be at a density more appropriate to the village situation rather than the extremely high densities proposed.

Regarding the remainder of the plan I would like to see in it proposals to deal with future medical facilities which are at present overstretched, increased parking at Horsley Rail Station which is at present full on most weekdays, increased capacity of local schools in order to deal with the proposed increase in population.

I view the plan as being produced at a very high level with less than sufficient consideration to the actualities that exist in a lot of the various locations in the Borough.

[Map]

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Scan_1720500011_Redacted.pdf (2.8 MB)
I would like to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan. There are numerous errors in the plan and it has a considerable lack of clarity.

I have written some of the major flaws and my objections in the inclusion of policy A35, Three Farms Meadows in the draft Local Plan.

- Local roads are at full capacity and often grid-locked in the rush hours, particularly when the weather is bad, when taking the children to the local school.

- I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

- The change to the site boundaries are not identified correctly on the plan (Appendix H p16) - I object to this.

- I object, unreservedly, to the increased area of the site as this now backs on to our house, UPTON FARM, which is one of the heritage sites in Ockham, and would have a HUGE impact on our outlook and views all around. Not to mention the noise pollution, environmental impact, and loss to our quality of life. We have spent years adhering to the stringent Heritage Rules to make sure this house is in keeping with its period and history.

- I object to para 21 which “limits” development in flood zone 2 and 3. Development should be EXCLUDED in flood zone 2 and 3.

- The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”!

- I object to the fact that the council has failed to remove this site from the local plan, despite receiving 1000’s of objections from local residents and statutory consultants.

- It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10)

- I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

- I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

- I object to the Council wasting tax payers and residents’ time and money not following due process and also ignoring previous representations over the years.

- I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

For all the above reasons, and numerous other major and minor reasons, I believe this proposal is unsound and should be removed from the plan as soon as possible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3784</th>
<th>Respondent:</th>
<th>17427105 / E Richings</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Blackwell Farm being included in this Plan as a development site (Policy A26 & Paragraph 4.1.9) which:-

Disregards an independent expert landscape study, which demonstrates that part of the site merits *Area of Outstanding Natural Beauty* status following Natural England’s forthcoming boundary review (para. 4.3.8)

Directs more office space to an extended business park (Policy E4), which will increase peak time congestion, particularly around the hospital and A&E which would only add to the current serious congestion of traffic in the area of the A3 and A31 and will affect existing residential areas. Currently in the morning peak traffic period there is severe congestion. This hospital is a Major Incident hospital and fast access must be maintained at all times.

Ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development (2.1.4a)

Adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

In 2015 the National Farmers’ Union expressed alarm that our ability to produce our own food and be self-sufficient had dripped from 80% in 1980 to 62%. This will drop to 53% by 2040. As world population grows there is no way that we should be building on good quality farm land. Especially commercial property. A recipe for disaster. Again you must listen to us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3786</th>
<th>Respondent:</th>
<th>17427201 / Graham Sykes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I am writing to confirm my continued objection to the inclusion of A35, Three Farm Meadows in the draft Local Plan for the reasons as given below:

- It is the least sustainable site in both this and previous versions of the plan because of the constraints on the site and the physical location.
- It is further away from any railway stations than any other identified strategic site.
- It is adjacent to one of the most congested stretches of strategic road network in the country (ie M25 Junction 10)
- Local road are already at capacity particularly when there have been any incidents thus making the SRN not free flowing.
- Public transport is already having to negotiate the overcrowded SRN and is therefore unreliable and subject to frequent delays.
- It is also adjacent to one of the most popular visitor attractions in the south-east, the RHS at Wisley which attracts huge numbers. Any regular events which take place several times per year already result in extra traffic chaos and I feel this has certainly not been taken into account.
- I also object to any changes within the green belt boundaries.
- I also object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objections from local residents and statutory consultants.
- I wonder and object to the fact that there has been no clear explanation why the council think it appropriate to have a regulation 19 consultation when the changes are major and needs to be based on the totality of the plan rather than the proposed changes.
- I object to the inclusion of A35 as it will not contribute to the 5 year housing projection due to constraints notably in the provision of sewage capacity
- I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
- I object to a 10% inclusion buffer in the housing number over the plan period as it totally unnecessary.
- I object to the transport evidence base including the SHAR 2016 Highways assessment report which has already been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
- I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
- I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBSPA etc. I believe that the housing number is unsound and open to legal challenge.
- I object to the apparent disregard for the impact of in-combination development on the THSPA, particularly damage caused by nitrogen deposition and high pollution levels.
- I object to the differences in the housing figures set out in the Annual Housing Target table. Another glaring example of why the plan is not sound.
- I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I also object to the reliance of the Carter Jonas study update 2017 which includes “demand” for retail space from companies that are already in administration.

I consider the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- It is noted in paragraph 4.3.15 that it is intended to inset (exclude) a number of developed sites from the Green Belt, Send Business Park in Tannery Lane being one of them even though there are no ‘Special Circumstances’ put forward to justify this.
- The site is a non-conforming use within the Green Belt however this alone does not justify its exclusion from the Green Belt, in fact there are a myriad of such sites throughout the entire National Green Belt.
- The site is NOT a major developed site within the Green Belt and therefore does not warrant exclusion. The group of existing buildings is not excessive and is surrounded by open fields and the River Wey Navigation therefore the site has an open character (an essential characteristic referred to in Policy P2 paragraph 4.3.12 and 14) and makes an important contribution to the Green Belt.
- If exclusion of this site from the Green Belt designation is intended to promote further development, residential or commercial, then this will only serve to increase the problems of traffic congestion and highway safety along Tannery Lane and its junctions with Polseden Lane and Send Road particularly at peak flow times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3797  Respondent: 17427713 / The Aldertons Farm Residents Company Limited  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The increase in the number of residential units from 45 to 60 (+15) is over a 30% uplift on a relatively small site and will lead to a cramped overdevelopment and an unacceptable increase in hardstanding to accommodate the increased parking and access roads resulting in further erosion of the Green Belt.
- Tannery Lane is a narrow secondary road that in parts is almost a single track width and therefore traffic problems will be more frequent commencing with the construction of the development requiring large vehicles and plant to manoeuvre into and out of Tannery Lane.
- The junction of Tannery Lane with Send Road is very restricted and requires substantial improvement to accommodate the increased use and to provide adequate safety for both pedestrians and vehicles.
- The proposal would severely impact on the open aspect of the surrounding Green Belt and in particular the views from the River Wey Navigation.
- The increase in units now proposed by the Council completely ignores the hundreds of previous objections made by local people.
- Recent flooding issues in and around the immediate area highlight the need for a conscience approach to development and by increasing the number of residential units on this site the incidence of flooding will be increased.
- The recent approval of the planning application (14/P/02289) for the Cartbridge Traditional Narrowboat Basin on the River Wey Navigation, (construction works are now underway) already puts pressure on the Tannery Lane junctions with Polseden Lane and Send Road. Therefore the cumulative effect of both developments will result in an increase in the potential for accidents at the road junctions unless substantial highway improvements are made.
Also there are over 50 parking spaces within the Cartbridge Basin application site which, together with the associated hardstanding, severely impact on the rural nature of the surrounding Green Belt area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3798  Respondent: 17427713 / The Aldertons Farm Residents Company Limited  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal for 400 residential units and 6 travelling showpeoples plots on a Green Belt site is contrary to current policies and ignores the many thousands of objections previously made by local people.

No ‘Special Circumstances’ exist or have been put forward to justify development on this Green Belt site.

The development will put extreme pressure on local roads and when considered with the other nearby proposals for development currently being put forward by the Council in the Draft Local Plan, (both residential and commercial/industrial), will result in gridlock at peak times with the resultant detriment to the quality of life and environment in the area, particularly considering the impact that the proposed North and South slip roads on to the A3 would make by drawing more traffic on to the local road network.

Residential development alongside major highways is known to cause health problems in the very young and old and if this site is developed the long term impact on the residents will in turn put more pressure on local and County Health facilities, particularly if the A3 slip roads abutting one side of the site, (as previously mentioned) are constructed thus increasing traffic flow around the site. The A3 is a major Trunk road that will inevitably become overloaded in the not too distant future given the lack of infrastructure improvements proposed by the Council to cope with the influx of traffic with regard to both proposed imminent and long term development.

The site contains ancient woodlands and should be protected (and enhanced) against development that might impinge upon the quality of the surrounding area and adversely affect the survival of the trees which are regarded as an important amenity for the area and can be seen from distant views.

Garlicks Arch adds to the important Green Barrier that separates the villages of Ripley and Send Marsh and any erosion of this will set precedent and eventually result in the merging of the two villages contrary to National Green Belt policy.

The site is currently designated as within Flood Zone 2/3 and as such development within Flood Plains should be avoided. If development is inevitable then Surface Water mitigation/management must ensure that flood water is properly dealt with and NOT directed so as to cause flooding elsewhere on existing developed land.

There is no proven demand to accommodate Travelling Showpeople in this area who, by the very nature of their business, will bring more traffic problems for the Ripley and Send villages when transporting very large vehicles to and from the site, where the visual impact of the vehicles and structures when stored, will be detrimental to the surrounding area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp172/3800</th>
<th>Respondent: 17427713 / The Aldertons Farm Residents Company Limited</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• The proposal for commercial/industrial development on this site is contrary to Green Belt policy.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• There are a number of suitable vacant sites and buildings in Slyfield and Guildford and there is no proven need to develop this essentially farmland site.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• The previous development proposal for this site in the 2014 Draft Local Plan was eventually deleted from that plan due to the objections raised. In the 2016 Draft Local Plan the proposal was re-introduced for a MAXIMUM development of 7000m², however in the current 2017 Draft Local Plan the proposal is for a MINIMUM of 7,000m² which could lead to a vast overdevelopment of the site with resulting negative impact on the quality of the surrounding area and the inevitable increase in traffic problems, particularly when considered with the many local developments currently being put forward in the 2017 Draft Local Plan and as stated above.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• The proposed development would be detrimental to the existing residential properties along this section of the London Road by way of increased noise, traffic, environmental and visual impact, including the potential for parked lorries and trailers when arriving at the site ‘out of hours’.</td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3801</th>
<th>Respondent: 17427777 / Valerie Ann Lazenby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to Policy A 42 for an Increase in the number of houses. This would increase traffic In the area, and last week it took me 10 minutes just to get out of Sanger Drive onto the A 247 at lunchtime!</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3803</th>
<th>Respondent: 17427777 / Valerie Ann Lazenby</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I object to Policy A 58, the large development of Burnt Common as there are clearly too many large on these small local roads We are already suffering from the enlarged Vision Engineering works in the village. I object to the latest proposed Local Plan as obviously all our talks and meetings with Council officials have had no impact at all on the proposals being made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

As a Resident of West Horsley I welcome the removal of the proposed housing developments A36 and A41. However, their removal represents little more than a sop to the impact of the overall development proposal on the Community that is East and West Horsley, Ockham, Ripley and the Green Belt.

The Horsley Countryside Preservation Society state that there were over 30,000 objections to the 2016 Plan. Given that the number of Residents of West and East Horsley, Ockham and Ripley number less than 10,000 suggests that the wider Community, equally, reject the Development Proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like you to note my support for the removal of sites A46 and A47. I do not believe that the infrastructure in the area could support these developments. Additional this is green belt land that should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3824</th>
<th>Respondent:</th>
<th>17432673 / M Clark</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

The increase to 60 homes in place of 45 homes is 33% more and too much

It ignores all the hundreds of previous objections made by local people

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3825</th>
<th>Respondent:</th>
<th>17432673 / M Clark</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change at Garlick’s Arch because:

It ignores all the thousands of previous objections made by local people

There is no proven demand for Travelling Showpeople plots in this location

It is beautiful permanent Green Belt and no “exceptional circumstances” exist

It will cause over-development of our village and the number of homes is excessive

It is exquisite ancient woodland that existed at the time of Elizabeth 1

It will join up Ripley and Send and defeat the key purpose of Green Belt
It is subject to frequent flooding and is currently a flood zone 2 allocation
It is contaminated by lead shot accumulated over fifty years
It will generate excessive traffic that will block up the local roads of Send and Ripley

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3826</th>
<th>Respondent:</th>
<th>17432673 / M Clark</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
</tr>
</tbody>
</table>

I object to Policy A 58 at Burnt Common because:

- **It was deleted from the 2014 draft** because of all the objections made previously

The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land

There is no need to build industrial or warehouse development **in the middle of the Green Belt** when Slyfield and Guildford still have **empty** sites and industrial units

The 2017 Employment Land Need Assessment shows a **reduction** in demand to 3.9 hectares for industrial land for the whole borough not a **huge over allocation of 10 hectares at Send in the Green Belt**

The impact on small surrounding roads will create traffic gridlock

It will join up existing villages and defeat the purpose of the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1941</th>
<th>Respondent:</th>
<th>17432673 / M Clark</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
<td>( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
</tr>
</tbody>
</table>

2865

Page 2865 of 2988
I am a long term resident of Send and grew up in Merrow. I have seen how the development of Merrow and Burpham has destroyed the character of these villages through poor planning over the last 40 years. Now is the time for this to stop.

Housing is not a special circumstance to allow building on the Green Belt. There are plenty of brown field sites that can be used.

For example - Do we need a new furniture megastore in Ladymead?

**Why have you ignored the thousands of objections to these plans? We live here. We should have a say.**

*Building on the countryside can never be undone. The reason we live in this area, and why we have a wealth of wildlife and tourists from all over the world is because of the Green Belt. GBC should stand up to these inappropriate plans and defend it from the developers at all costs.*

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** pslp171/1942  **Respondent:** 17432673 / M Clark  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp173/529  **Respondent:** 17432737 / Friends of Normandy Wildlife (Gill Woolfson)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. We support the removal of A46 from the Local Plan. We had objected to the inclusion of the site in the previous version of the Local Plan because of the significant loss of biodiversity if it went ahead, and the effect on the Thames Heaths Basin Special Protection Area.

2. We support the removal of A47 from the Local Plan. We had objected to the inclusion of the site in the previous version of the Local Plan because part of the site is an SNCI.

3. We object to the lack of traffic infrastructure improvements in Normandy. With almost 10,000 new homes being built in the west of Guildford, including additional homes in site A29, without these improvements there will be severe congestion on our roads. It is known that the pollution resulting from traffic congestion has serious consequences for both animal and human health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/530  Respondent: 17432801 / Claire Stone  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly, my main objection is the idea of insetting West and East Horsley from the green belt and I reject the fact that no change is being proposed about this. The very idea of the green belt is to protect the beautiful countryside from being overrun by the metropolitan sprawl. To start moving this line I believe is the beginning of the end of our stunning countryside that defines our neighbourhood and has done so for centuries.

I welcome the reduction in the number of new homes being proposed in West Horsley, however there is still very large number of properties proposed on the green belt in East and West Horsley.

Despite the reduction in proposed dwellings, there is no corresponding increase in infrastructure or services such as shops, medical centre, library and Horsley Station proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3835  Respondent: 17432929 / Andrew Jackson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to object in the strongest possible terms to the plans submitted for reconsideration this September, following the rejection last year of the plan to develop the former Wisley Airfield at Three Farm Meadows. Any development in this area is unwarranted and will seriously damage the locality.

Please ensure that the existing concerns of all the local residents to this plan are conveyed to the Inspectors and that they are aware of the volume of objections against this development which cannot proceed to spoil this local area.

The application was rejected by GBC on hood ground last year when TFM should have been removed from the Local Plan. It is wrong to bring it back for consideration when it was turned down on so many grounds and for very good reasons.

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   a. The associated traffic increase from the RHS has not been taken into account.
   b. The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
12. Opportunity (3) should be common to all sites and is not unique to this site
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
16. I object to the removal of additional 3.1 ha from the green belt without any justification
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers' time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.
36. Guildford Borough Council should not be entertaining any proposals from a Cayman Islands registered company. These types of entity are often associated with financial crime and tax evasion. In effect, Guildford Borough Council will be out of step with UK Government policy to not have any dealings with non-transparent entities, if this application proceeds.

Please consider all of the above and ensure that plans for a enormous town in the most inappropriate location are again refused. There are many other parcels of land around that can be considered for housing which would not impact on a small community in this way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Attached documents:

Comment ID: pslp172/3856  Respondent: 17433409 / Julie Iles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Policy A36 Thatchers Hotel East Horsley site is no longer in the Local Plan and I support its’ removal for housing development and believe there is a case for retaining the current use as a Hotel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3868  Respondent: 17433409 / Julie Iles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to site A58 Burntcommon, which has now become a ‘Strategic Employment Site’. The overall burden on Send (and West Clandon) of the minimum of 7000sq m of industrial space (which could therefore be much larger) is greater than the now deleted up-to 7000 sq m from the neighbouring site A43 Garlick’s Arch. This will lead to increased traffic and congestion in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1962  Respondent: 17433409 / Julie Iles  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E1
<table>
<thead>
<tr>
<th>Comment ID: pslp171/1963</th>
<th>Respondent: 17433409 / Julie Iles</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. In Policy E1, E2 there is too much emphasis on providing retail and commercial premises in Guildford town centre, when the pattern of business is changing and more town centre housing is needed. This would ease the pressure on housing on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1973</th>
<th>Respondent: 17433409 / Julie Iles</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. In Policy E1, E2 there is too much emphasis on providing retail and commercial premises in Guildford town centre, when the pattern of business is changing and more town centre housing is needed. This would ease the pressure on housing on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I also have concerns about the delivery of infrastructure to support improvements which are required as a direct result of new housing, for example new A3 slip roads at Burntcommon. Whilst I welcome developer funded commitments for road network improvements I am concerned that this will lead to a reduction of any affordable housing which will be delivered. This concern reflects a change in Section 4.2.40, where there seems to be some softening of the language around the issue of developers needing to demonstrate lack of economic viability of affordable homes in order to reduce their standard quota (40%). This concern applies to other developer funded projects including Wisley cycle networks.
I welcome the change in language suggesting that Rural Exception Homes (Section 4.2.46) now need to ‘meet the housing needs of the local community’. In village settings across The Horsleys, the definition of ‘the local community’ should be those living and working within the village, and I would expect a high level of consultation with villagers as well as the Parish Council and reference to Neighbourhood Plans such as that formally submitted to Guildford Borough Council by Effingham Parish Council to influence any such projects.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1972  Respondent: 17433409 / Julie Iles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to POLICY P2 (6), specifically the new phrasing ‘Limited infilling may also be appropriate outside the inset or identified settlement boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village’ referring to Ockham and Wisley, and by extension to other villages with settlement boundaries. This change in language creates less clarity around the purpose of settlement boundaries as regards development policy. This objection is made in the context of the fact that that there is no change to POLICY P2 (5), the intention for East Clandon to have a settlement boundary for the first time, which the Parish Council have previously and still object to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1961  Respondent: 17433409 / Julie Iles  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy S2 for the proposed provision of the overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan and they remain too high as shown by another objective assessment report by Neil MacDonald. There is insufficient transparency in the overall numbers and Guildford seems in danger of becoming a dormitory town for London and surrounding areas such as Woking which have an unmet need rather than meeting the needs of residents of Guildford Borough.
1. I object to the fact that in Policy S2, despite the aforementioned slight apparent reduction in overall housing numbers and industrial space, the reduction is mostly in other areas such as Normandy/Flexford with the East of the borough taking a disproportionate and even increased share.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3853  Respondent: 17433473 / A Winton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my support for the removal of sites A46 and A47, owing to the inability of the infrastructure to cope with developments of this magnitude, i.e. insufficient roads, waste water, sewage, flooding electricity supply and health care and the fact that this is Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1964  Respondent: 17433473 / A Winton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site, as this could enable development within these areas at a much higher density. These areas contribute to the ‘open-ness of the Green Belt’.

GBC must commit to the improvements that are necessary for the scale of the proposed ten thousand homes that will be built within a ten-mile radius of Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3854  Respondent: 17433601 / D B Winton  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

I wish to register my support for the removal of sites A46 and A47, owing to the inability of the infrastructure to cope with developments of this magnitude, i.e. insufficient roads, waste water, sewage, flooding electricity supply and health care and the fact that this is Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/1965</th>
<th>Respondent: 17433601 / D B Winton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I wish to register my objection to the removal from the Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site, as this could enable development within these areas at a much higher density. These areas contribute to the 'openess of the Green Belt'.

GBC must commit to the improvements that are necessary for the scale of the proposed ten thousand homes that will be built within a ten-mile radius of Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/542</th>
<th>Respondent: 17433665 / Nancy Hamilton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I also object the proposal to inset Send Business Park from the Green Belt because of the increased traffic this will cause and the removal of the openness of the River Wey corridor which is exceptional at this part of the river valley.

In summary the local plan fails to meet the needs of the residents of Send. It will substantially affect the conservation of the area with overdevelopment causing large changes to the setting of Send, affecting the natural and historic context of the villages. The local plan fails to meet NFFP chpt 11. Conserving and enhancing the natural environment. Residents of Send know that the proposals will have a massive negative affect on local wildlife and cause increases in pollution, putting their health at risk. The local plan fails to meet NFFP Chapt 9. Protecting Green Belt land in Send and Ripley, by developing in green belt land without exceptional circumstances being met. The historic environment of the villages will be changed irrecoverably with the proposals in the local plan (NFFP Chapt 12), these proposals in the local plan are completely out of proportion with the small village environment. Both Ripley and Send have a long history of settlement and retain many aspects of a rural village, e.g. annual fairs, active local farms, immediate access to countryside, distinct village centres these will be lost with the proposals.

In brief the local plan proposes excessive and unnecessary changes to the villages of Send and Ripley and the residents of these areas do not want this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3863  Respondent: 17433665 / Nancy Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the Policy A42 change at Clockbarn Nurseries in Tannery Lane because of the increase in traffic this will cause and the safety of the road junctions in the village. There will be further strain in amenities such as schools, medical centres etc which are currently straining under the pressures of recent housing developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3860  Respondent: 17433665 / Nancy Hamilton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy A58 Land at Burnt Common, London Road. This proposal has been changed repeatedly in the local plan since 2014, there is clear uncertainty over its suitability. This is a large allocation of green belt land for industrial use which fails to follow NFFP, in particular chapt 11: ‘Conserving and enhancing the natural environment’. The impact of increased traffic in the local area from the increase of industrial use on this site will affect the heath and environment of the resident of both Send and Ripley. There are inadequate transport links (e.g. rail) and the air pollution and safety on local roads will deteriorate, already the main concerns to local residents of Send and Ripley. Any development on this site will increase these issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/367</th>
<th>Respondent: 17433665 / Nancy Hamilton</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a whole the 2017 plan fails to follow NFFP para 17 core planning principals and does not ‘contribute to conserving and enhancing the natural environment and reducing pollution’. There are fundamental errors made in requirements for housing and employment based on the source documents e.g. SHMA and ELNA. The data sources do not show empirical evidence for the changes in the UK’s housing and economic status after it leaves then European Union. The UK population has voted to make a significant change to the country’s economy and population and the impact of Brexit on the local area must be accurately evaluated or else the entire basis of the local plan is flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/3867</th>
<th>Respondent: 17433729 / Ian Price</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Anyone who visited this area would be able to see the proposed increase in housing would be detrimental to this area. I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.
“Development proposals near Ash Green to have recognition of the historic location of Ash Green village and Manor and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development must not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built-up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development.
- Please note that Infrastructure is not just roads! This area has poor facilities for its current residents. Water, Gas, Sewage, Electricity, Shops, Doctors, Schools are all currently under stress, or in short supply.

- Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) and many other improvements must be completed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Road solutions to the following areas are also required before any development of A29 is permitted.

  1. The Street in Tongham
  2. A331/A323 intersection
  3. A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

“Development proposals near Ash Green to have recognition of the historic location of Ash Green village and Manor and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development must not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built-up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Ash Green is not part of the Ash & Tongham Urban Area. It was always a separate entity as can be seen on any OS map, and your own council documents. Therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- **4.3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- **4.3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: pslp172/3878  Respondent: 17433985 / Stephen Pedley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2878 of 2988
• I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence. Moreover, this number of houses, together with the many thousands more being built in neighbouring boroughs will put an pressure on our local infrastructure that it cannot sustain.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

• Ash Manor has a rich history dating from its entry in the Doomsday Book. It has been owned by several kings and has witnessed foul deeds and intrigue. Some historical documents refer to the Manor as a Palace. This is a building of great significance to our local history and its setting is as much part of this history as the building. We have a moral duty to protect this site for the enjoyment of future generations. I believe the requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house, and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore, solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8:
“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:
The focus of the local plan on large scale development in the Ash and Tongham Urban Area will substantially increase the number of commuters travelling into Guildford for work and recreation. These commuters will be joined by those travelling from neighbouring boroughs adding to the congestion on roads that are already heavily congested. I support GBC's policies to increase access to and use of sustainable transport options, but I believe that the policies do not go far enough in creating an integrated network of cycling super-highways that are physically separated from the roads. These will provide safe routes for children to cycle to school (improving child health and reducing congestion around school gates), for people to cycle greater distances to work (cycle super-highways could connect Guildford with the surrounding towns and villages for up to a 12-mile radius), and for people to use for safe recreation. The cycle routes will be funded specifically by an additional levy placed on all new developments.

- Policy ID3 1 should read: New developments will contribute to the delivery of an integrated, accessible and safe transport system, including the construction of an integrated network of safe cycle and walking routes between Guildford and the surrounding towns and villages, maximising the use of the sustainable transport modes of walking and cycling for commuting and recreation, and the use of public and community transport.

- Policy ID3 2c should read: the creation of cycle and walking routes between Guildford and surrounding towns and villages, to local facilities, services, bus stops and railway stations, to ensure their effectiveness and amenity. To bring about the improvement, and expansion of existing routes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy ID3 1 should read: New developments will contribute to the delivery of an integrated, accessible and safe transport system, including the construction of an integrated network of safe cycle and walking routes between Guildford and the surrounding towns and villages, maximising the use of the sustainable transport modes of walking and cycling for commuting and recreation, and the use of public and community transport.

Policy ID3 2c should read: the creation of cycle and walking routes between Guildford and surrounding towns and villages, to local facilities, services, bus stops and railway stations, to ensure their effectiveness and amenity. To bring about the improvement, and expansion of existing routes.
• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

• 4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford Borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

• 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

• Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3895  Respondent: 17434049 / Lucy Starke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. I object to removal of Brownfield site (A34) from the Plan

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3894  Respondent: 17434049 / Lucy Starke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable. The amount of empty shops in Guildford, especially at the top of the High Street would surely be a good reason not to increase the retail provision in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to the increase in housing proposed in Tannery Lane (site A42)

This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are **no exceptional circumstances** for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3890  Respondent: 17434049 / Lucy Starke  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be **no** inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3898  Respondent: 17434049 / Lucy Starke  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"*We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan*".
The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3892  Respondent: 17434049 / Lucy Starke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

1. I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough. Why when connection is so bad on the A3 and surrounding roads in this area are you proposing a possible additional 22,000 cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3893  Respondent: 17434049 / Lucy Starke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

1. The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. a)The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, ... (site allocation A25) [ than the Burnt Common site did ]”

2. b)The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”
Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/3896  **Respondent:** 17434049 / Lucy Starke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurly in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/1986  **Respondent:** 17434049 / Lucy Starke  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes. Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other
community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/1987  Respondent: 17434049 / Lucy Starke  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object removing Send Business Park from the Green Belt (4.3.15).

Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3936  Respondent: 17434689 / Anya Williamson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change for the following reasons:

- The 33% increase from 45 to 60 homes is excessive
- Please don't ignore hundreds of objections already made by local residents
- It will worsen traffic congestion, air pollution and dangers to residents and their families in Send, Tannery Lane and at the A247 junction. The roads are too narrow.
- It will set a precedent for further erosion of Green Belt in the village and surrounding areas
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3937  Respondent: 17434689 / Anya Williamson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43 change for the following reasons:

- No ‘exceptional circumstances’ exist to justify this use of Green Belt land
- It ignores the thousands of previous objections already made by local residents
- The site is ancient woodland from the time of Queen Elizabeth 1 and cannot be replaced
- The development would effectively join up the villages of Send and Ripley and defeating the very purpose of Green Belt land
- It is currently a Zone 2 Flood area and development will make matters considerably worse
- It will generate massive amounts of additional traffic that the local road network simply cannot cope with

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3938  Respondent: 17434689 / Anya Williamson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A58 change for the following reasons:

- It was deleted from the 2014 draft as a direct result of the huge number of objections made previously

- The parameters of allocation of land for industrial or warehousing use has changed from "a maximum of 7,000 sq m" to "a minimum of 7,000 sq m" in the 2016 plan

- Slyfield and Guildford still have empty sites and units. There is no need for this development in the middle of Green Belt land

- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for the whole borough

- Hence, an allocation of over 10 hectares just at Send in Green Belt land is utterly unnecessary

- A further increase in traffic would cause gridlock on already busy local roads, and an increase in air pollution and danger to local residents and children

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2014  Respondent: 17434689 / Anya Williamson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to inset Send Business Park from the Green Belt for the following reasons:

- It is an old site that should not be further developed because of its location within Green Belt land on the Wey Navigation

- The road network is narrow and restricted, and totally unable to service any new expansion

- Road links to the A3 and elsewhere go directly through the village, which would increase traffic pollution and danger to local residents and children

To summarise, all these developments in Green Belt land have attracted many thousands of objections from local residents - they are not wanted, but more importantly, they are simply not needed. There are many brown field sites throughout the borough that have not been taken advantage of, only because they would not yield as good a profit for developers.

Housing is needed, but it must be built in the right places, not just the most convenient or most profitable, and be accompanied with investment in local services for the huge increase in numbers of people that would come along with the proposed construction. The real tragedy is that were these developments in Send, Send Marsh and Burnt Common allowed to go ahead, the quality of life for existing and new residents alike would be much poorer than it is now. Local roads, schools and medical facilities are already fully stretched. There would be a considerable human cost for hitting government targets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3939</th>
<th>Respondent: 17434753 / Robyn Horsburgh</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I support the removal of A46 and A47 Policies - which are in Green Belt land and would totally overwhelm the local infrastructure especially the roads.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2015</th>
<th>Respondent: 17434753 / Robyn Horsburgh</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the assertion in Policy P2 Green Belt para 4.3.13 which would re-draw the Green Belt boundary. If fails to appreciate the importance of the Metropolitan Green Belt and that it needs to be permanently protected.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I also object to the removal from Green Belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries traveller site which contribute to the openness of the Green Belt.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3940</th>
<th>Respondent: 17434785 / Steve Nicoll</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: pslp172/3941</td>
<td>Respondent: 17434785 / Steve Nicoll</td>
<td>Agent:</td>
<td></td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------------------------------</td>
<td>-------</td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Now 400 homes and 6 Travelling Showpeople plots

I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• It is contaminated by lead shot accumulated over fifty years
• It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3942  Respondent: 17434785 / Steve Nicoll  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

I object to Policy A58 at Burnt Common because:
• It was deleted from the 2014 draft because of all the objections made previously
• The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
• The impact on small surrounding roads will create traffic gridlock
• It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2016  Respondent: 17434785 / Steve Nicoll  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Send Business Park now taken out of the Green Belt altogether

I object to the proposal to inset Send Business Park from the Green Belt because:

- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

In summary I appreciate and understand the need for additional housing and business in the borough but firmly believe that this plan is not fair particularly toward the residents of Send and Ripley and feel that overall this will be at everyone’s detriment including those new residents planning to move into Ripley and Send. Ripley and Send are already at capacity and I think GBC need to review the draft plan and find another solution that does not have a detrimental effect on existing residents that already struggling for local services that are already stretched.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/374  Respondent: 17434785 / Steve Nicoll  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having previously objected to the original plan I would also like to record my further objection to the draft plan as it has such a detrimental impact on Send/ Ripley and the surrounding areas. What I find astonishing is the complete contempt and disregard for the quality of life shown to the residents of Send and Ripley by Guildford Borough Council (GBC) that will have to suffer in the long term the changes that are being proposed.

The sheer aptitude and lack of compassion by GBC for the existing residents holds no relevance in the ambition of GBC to increase the population particularly of Send by up to 50%. One can only imagine the disastrous impact this would have on the quality of life and of not only the existing residents but if the plan were to go ahead then the quality of life for those moving into the village.

The other main objection I have is to the A3 works at Burnt Common. I’m sure that GBC have already analysed the amount of traffic that passes from West Crandon and through Ripley having exited the A3 as it makes it way east through send along to Old Woking. The road is at over capacity during rush hours as it is and to be honest if Burnt Common become and on and off ramp for the A3 the Send Village will become a carpark not only at rush hour but all through the day. One can only imagine the quality of life for those living along Send Barns Lane and Send Road. The noise and pollution from vehicles would be unbearable and no doubt exceed all pollution levels with diesel and petrol fumes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3943  Respondent: 17434817 / Jenny Wicks  Agent:
Policy A25

I object to this changed policy

The Green Belt at this point prevents the sprawl of urban Guildford into the countryside. Development here will be highly visible from the A3 and, together with Former Wisley Airfield, Garlicks Arch and Burnt Common will form a built up corridor from the London conurbation southwards beyond Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy A43

I object to this policy

This site is stated to be for approximately 400 homes, but the removal of 7,000 sq metres of industrial floorspace proposed for this site in the previous draft plan means that the eventual number of houses is likely to be considerably greater. This in an area remote from services and without credible access to public transport. It will create a car dependent community, increasing the stress on the nearby A3. No infrastructure provision for this site is included in the infrastructure delivery plan.

Burnt Common is already a site of considerable traffic congestion which will be exacerbated by the proposed slip roads on (northbound) and off (southbound) the A3 are built, feeding traffic onto the A247 through West Clandon and through Send Village, both unsuitable for increased traffic flows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A46

I object to this policy

My objection is pragmatic in that this site is shown in the Sustainability Appraisal to be much more sustainable than A35. Therefore it should not have been deleted from the plan whilst A35 remains in it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2018  Respondent: 17434817 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1

I object to this policy insofar as it relates to the Green Belt site at Burnt Common

The reality of demand for industrial space is that it is nationally in decline and this is evidenced in Guildford by the substantial number of planning permissions that have not been implemented (38,000 sq metres). Development, in the uncertain post-Brexit world, should certainly not be directed to a Green Belt site like Burnt Common. An extension to the Slyfield Industrial Estate would be more appropriate.

The stipulation of a ‘minimum’ area of development at Burnt Common means that the this could turn into a large and intensive industrial site, quite unsuitable for its semi-rural location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2017  Respondent: 17434817 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3964</th>
<th>Respondent:</th>
<th>17440225 / Louisa Scott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the Policy = A42 change at Clockbarn in Tannery Lane because:

- The plans have increased from 45 homes to 60 homes which is 33% and this is too much
- It ignores all the hundreds of previous objections made by local people
- It will increase problems with the traffic in Tannery Lane and at the A247 junction
- It will cause erosion of the Green Belt in our village
- It will increase surface water flooding, which is already a problem and is increasing with further development
- It will impact on the open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Policy A43 change at Garlicks Arch because:

- It ignores all the thousands of previous objections made by local people
- The is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no exception circumstances exist
- It will cause overdevelopment of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over 50 years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3966  Respondent: 17440225 / Louisa Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burn Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word minimum is a change from the previous maximum in the 2016 plan and since that time there has been a decline in the demand for industrial land
- There is no need to build industrial or warehouse developments in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up the existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2025  Respondent: 17440225 / Louisa Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from the Green Belt because:

- There is highly restricted vehicular access along Tannery Lane in both directions
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3971  Respondent: 17440385 / Rob Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A42 Clockbarn Nursery, Tannery Lane

The proposed allocation for 45 homes in the previous draft plan on green belt land was objected to & I object to this revision which now proposes a 33% increase to 60 homes. Tannery Lane is unsuitable for the quantity of traffic which would be generated, as is the junction with the A247, and there are no exceptional circumstances to warrant development on the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/3972  Respondent: 17440385 / Rob Barnes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 Garlick's Arch, Send Marsh

I object to the proposed allocation for 400 homes and 6 travelling show people plots. There are no exceptional circumstances to warrant development on the green belt. There is insufficient services infrastructure for housing and show people plots, nor any justification for concentrating 6 of the proposed 8 borough-wide show people plots within Send. The road network is insufficient for housing development on this scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
<thead>
<tr>
<th>Comment ID: pslp172/3973</th>
<th>Respondent: 17440385 / Rob Barnes</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Policy A58 land at Burnt Common, London Rd</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to a new allocation of 7,000 sq m of industrial or warehousing which was deleted from the 2015 draft. I also object to the wording of the allocation: the 2016 &quot;maximum&quot; allocation of 7,000 sq m has now been changed to &quot;minimum&quot;. There is a surplus of industrial premises in the borough and the requirement for further industrial/warehousing has not been proven. The road infrastructure is inadequate and there are no exceptional circumstances to warrant development on the green belt.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comment ID: pslp171/2027</td>
<td>Respondent: 17440385 / Rob Barnes</td>
<td>Agent:</td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Policy 2 paragraph 4.3.15 green belt.</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the proposal to inset Send Business Park from the green belt. The business park fronts the River Wey navigation which is acknowledged as protected corridor. The business park is a historical accident arising from a former historic industrial use. Tannery Lane is too restricted for any increase in traffic and the business park should remain within the green belt to inhibit further development.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Attached documents:</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Comment ID: pslp173/556  Respondent: 17440513 / Christopher Diacon  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of East Horsley I wish to register my objection to the proposals outlined in the amended 2017 plan.  

It is my clear opinion, even with these changes, the nature and whole environment of our area will be irrevocably changed for the worse and such large scale development is neither appropriate or desirable.  

I expect and demand that the views of local residents, who are overwhelmingly opposed to these proposals, to be given significant consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:  


Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.1 Policy A26 in the Draft Local Plan 2017 provides for development at Blackwell Farm on the Hogs Back, Guildford. The allocation is still a residential led mixed use development outlined to provide for 1,800 homes but with a minimum of 1,500 homes to be delivered within the Plan period. The employment land is reduced by 1,000sqm to 30,000sqm, which will still form a 10-11ha extension to the west of the current Research Park.

2.2 The allocation would also still provide a range of other ancillary uses including a two-form entry primary school, retail units across the A use class and D1 community buildings but will now also need to provide a secondary school of up to six-form entry of which two forms are needed to serve the housing on the site.

4.1 The transport infrastructure requirements outlined for Policy A26 within the Draft Local Plan 2017 are outlined below with the corresponding cost estimate in italics from the Infrastructure Schedule in Appendix C of the GBC Draft Local Plan 2017.

i) Vehicular access to the site allocation will be via the existing or a realigned junction of the A31 and Down Place access road which will be signalised, and from the site to Egerton Road, preferably Gill Avenue (LRN2 - £5 million and LRN 3 - £5 million).

ii) The design of the improved Down Place access road will be sympathetic to its setting;
iii) A through vehicular link which will be controlled is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route for employees and emergency services to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital, as well as a choice of vehicular access for the new residents/occupiers. This will reduce impact on the A31/A3 junction, in advance of the delivery of Highways England’s A3 Guildford scheme (LRN4 - £20 million);

iv) Developer to provide the western route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the western route section on the Local Road Network, both having regard to the Sustainable Movement Corridor Supplementary Planning Document (SMC1 – proportion of £20 million);

v) A significant bus network to serve the site and key destinations including the existing western suburbs of Guildford and the town centre. (BT6 – £TBC)

vi) Necessary and proportionate contribution to delivering Guildford West (Park Barn) railway station (NR2 – proportion of £10 million);

vii) Interventions which address the potential highway performance issues which could otherwise result from the development (LRN5 £5-10 million).

4.2 Compared to the same list of infrastructure which was provided last year in the previous iteration of the Local Plan there has been an increase in the level of transport infrastructure requirements which the site must provide, namely in the form of the bus network as per scheme BT6 relating to the Sustainable Movement Corridor.

4.3 The transport infrastructure costs associated with the site outlined above now amount to £70-£80 million to deliver just 1,500 residential units in the Plan period (1,800 in total) and 30,000sqm of commercial mixed-use development. The proportionate level of contribution towards the Guildford West (Park Barn) railway station and the western route section on the Local Road Network are as yet unknown at this early stage.

4.4 However, the Blackwell Farm site is the only development site in the Guildford urban area which has the specific written requirement to contribute to the new Park Barn station and since it is indicated as being solely developer funded in the Infrastructure Strategy (Appendix C) of the Draft Local Plan 2017 it is assumed that the Blackwell Farm allocation would need to contribute a significant proportion of the £10 million cost. The western section of the Sustainable Movement Corridor is also only noted on the requirements list for the Blackwell Farm allocation although there is money available through the Local Growth Fund to contribute to this, therefore it is estimated that the obligation would be circa 50% of the total cost of this scheme. This would make the total transport contributions for the Blackwell Farm development around £60 million.

4.5 Concern is therefore raised that the level of transport infrastructure costs which the Blackwell Farm site is required to deliver (~ £35,000 per unit) as well as the new secondary school on top of the numerous other costs of infrastructure mitigation is disproportionate to the size of the allocation and brings into question the deliverability and financial viability of the allocation in the Local Plan period contrary to Paragraph 173 of the National Planning Policy Framework (NPPF) as previously discussed in RGP’s previous report TN01 (June 2016).

‘Through vehicular link’ between A31 and Gill Avenue

4.6 Policy A26 now states that the through vehicular route between the A31 Farnham Road and Egerton Road will be ‘controlled’ and will be for employees and emergency services to the Surrey Research Park, the University of Surrey’s Manor Park Campus, Royal Surrey County Hospital staff, patients and visitors as well as for residents on the site. This is a significant and wide range of people who will be permitted to use this route. The method of control is an integral part to the deliverability of the whole site allocation to ensure that it is not used by ‘rat-running’ traffic avoiding the A31/A3 junction and this is a concern that was previously highlighted in RGP’s TN01 (June 2016).

4.7 SCC has indicated that ANPR cameras will be the preferred method of control for the vehicular link road. RGP has looked into the use of ANPR cameras to carry out this type of enforcement and a scheme in Cambridge is known to exist at the Cambridge Biomedical Hospital to deter rat-running vehicles attempting to avoid congestion between the M11 and central Cambridge.
4.8 It is understood that the Cambridge scheme consists of cameras positioned at each of the 4 access points to the Hospital site and the system is based on the time period that cars are recorded as taking between any 2 of the 4 cameras.

4.9 If the duration of stay that the ANPR cameras record associated with any car is below a set period of time which would accord with a ‘through traffic’ speed then the system assumes they were using the Hospital roads as a short-cut and they are charged a fine of £50. If there is a longer dwell time then it is assumed that the cars are legitimate patients/visitors to the Hospital and therefore no fine is issued; additionally, the staff that work in the Hospital are registered on the system so that they do not get fined.

4.10 The roads are understood to be privately owned by the hospital estate and the cameras are owned by the site’s private parking contractor, however, the fines are enforced by Cambridgeshire Police.

4.11 This is a small-scale example of the type of system that would need to be implemented on the Blackwell Farm link road, but with it raises a series of questions related to site deliverability such as:

i) Will the developer provide for the financial enforcement costs of the link road restrictions for the lifetime of the road i.e. in perpetuity? Is this included within the £20million cost for LRN4?

ii) Will Surrey Police be expected to provide the enforcement of the ANPR in perpetuity for the lifetime of the road?

iii) How will all of the people who will be granted access to use the road (residents, University staff and students, Research Park employees, Royal Surrey County Hospital staff, patients and visitors) be able to be differentiated from through traffic?

4.12 Whilst these are operational questions and could be considered as relevant for discussions during a future planning application, they are also considered fundamental to the successful deliverability of the vehicular link road and ensuring that it does not become an attractive ‘rat-run’ for through traffic between the A31 and the A3, but still delivers the aim of being a link road to serve all of the desired uses.

4.13 As discussed in further detail in RGP’s TN01 (June 2016), the implications on the A31 Down Place junction and the Egerton Road junctions of all-purpose through traffic using this route have not been modelled in the strategic model and it is imperative that the link road restrictions operate successfully to ensure that other junctions are not adversely impacted.

EGERTON ROAD AND SURROUNDING AREA

5.1 The Egerton Road Roundabout and the Egerton Road/Gill Avenue junctions are forecast to experience an increase in vehicular traffic which would push the ratio of flow to capacity over actual capacity based on the SHAR 2016 report. This assessment is not understood to have included any specific assessment associated with the new station at Park Barn or any impact associated with the new secondary school on the Blackwell Farm site.

5.2 It is accepted that the SCC strategic model cannot model specific junction impact as accurately as microsimulation models such as LinSig and Junctions 8 and it is further acknowledged that this detail is not necessary for the high-level assessment required for a Local Plan. However, the true quantum of flows forecast to be generated by all of the Draft Local Plan 2017 aspirations should be incorporated to allow consideration of detailed mitigation to commence.

5.3 The Sustainable Movement Corridor (SMC) Update published in February 2017 by GBC identifies that mitigation options are already being considered for providing additional capacity at the Egerton Road Roundabout and its junction with the A3. The process of considering detailed mitigation to inform the strategic allocations is supported and welcomed, but concern is raised that the options are being considered without the traffic impacts from the Park Barn station and the new secondary school being incorporated.

5.4 The new Park Barn station southern access for instance will likely take its primary access from the western side of Egerton Road to the east of the Hospital. The position of this access will likely result in an increased demand on right turning vehicles at the Egerton Road/Gill Avenue signal controlled junction. Increased provision for right turning vehicles in this location will consequently reduce the capacity of the junction for other movements which may well impact on the new designs for the Egerton Road Roundabout, the SMC and the wider local highway network.

5.5 Additionally, the provision of a new secondary school on the Blackwell Farm site (relocated from the Land to south of Normandy and north of Flexford site allocation [previous Policy A46] which has been removed in its entirety) will ultimately draw vehicular traffic through the Egerton Road junctions. The Blackwell Farm allocation (Policy A26) wording
states that the new secondary school would be ‘up to six form entry of which two forms are needed for the housing on the site and the remainder for the wider area’. This indicates that two-thirds of the secondary school children attending the new school will come from off-site. Assuming that there are 30 children per form, 6 forms per year and 5 years in the school (i.e. Years 7-11) there would be a 900 student capacity at the school of which 600 students would need to commute in from outside the Blackwell Farm site each day.

5.6 Whilst the Sustainable Movement Corridor proposals and the new Park Barn station will undoubtedly assist some school pupils and staff in travelling to the new secondary school sustainably from other parts of the borough, there will still ultimately be a draw of vehicles through the Egerton Road junctions to the secondary school, particularly during the morning peak period, which has not been considered.

6.1 The Draft Local Plan 2017 has addressed some of the points which RGP raised in the previous Technical Note in June 2016, however there is still concern regarding the deliverability and viability of the Blackwell Farm allocation (Policy A26) for the following reasons:

i) The required transport infrastructure requirements of around £60 million to make the site acceptable are considered to be excessive in comparison to the scale of the development proposals and the viability and deliverability of the site are still questioned. Compliance with paragraph 173 of the NPPF is also raised;

ii) There are still operational concerns regarding how the through vehicle link will be controlled and how the enforcement will be carried out, by whom and whether it can effectively remove potential for ‘rat-running’ between the A31 and the A3 given the wide range of permitted users of the road;

iii) The deliverability of the scheme still requires third party land to access Gill Avenue and it has not been demonstrated that this is possible to acquire;

iv) The vehicular impact resulting from the requirement to now provide a six-form entry secondary school on the site whereby two thirds of the children would travel in from outside the Blackwell Farm site has not been included in the strategic traffic model and is not understood to be accounted for in the current Egerton Road detailed layout designs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 226389 - Sketch drawing ‘Initial Junction Arrangement’ provided by University of ....pdf (210 KB)

Comment ID: pslp172/3975  Respondent: 17440545 / Compton and Worplesdon Parish Council  Agent: RGP-Transport Planning & Infrastructure (Neil Rowe)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.1 An Addendum report to the original ‘Guildford Borough Council Proposed Submission Local Plan 2016: Strategic Highway Assessment Report’ (SHAR) (June 2016) has been produced by GBC which it states that the Addendum: ‘provides a high level review of the potential changes to traffic impacts from those reported in the SHAR 2016 which are expected as a result of the key changes made to proposed site policies and to the programme of transport schemes as identified in the Draft Local Plan 2017’.
3.2 The key changes are outlined in Table 2 of the document where on the final page it acknowledges the new Policy A59: New Rail station at Guildford West (Park Barn) as a key change to the Draft Local Plan 2017 and states:

‘It is expected that, borough-wide, modal shift of car to rail trips will significantly outweigh new vehicle trips to access the new rail station. The station is not planned to be a parkway station so sustainable transport options for travel to and from the site will be a priority.’

3.3 It is acknowledged that locating a new station adjacent to existing (Park Barn) and proposed (Blackwell Farm) housing settlements as well as the Royal Surrey County Hospital, Surrey University and Surrey Research Park is a very positive move in terms of encouraging sustained modal shift from the private car for regular journeys such as commuting and indeed for short trips to and from Guildford town centre. It is however a concern that the actual vehicle activity associated with the new station has not been specifically included in the strategic model.

3.4 The assumption by GBC that the current traffic modelling completed in 2016 represents a ‘worst case’ as the traffic levels will reduce borough-wide due to modal shift is misleading since the zones on the network which include and adjoin the new station are likely to experience an increase in vehicular traffic. As well as a likely increase in vehicular traffic, there would also be an associated change in vehicle routing dynamics on the overall network as vehicles access it and this has not been taken into account.

3.5 Despite it not being a ‘parkway’ style station with parking provided (other than disabled parking), the new station will still generate the need for vehicular access from taxis, buses and ‘kiss and ride’ facilities (i.e. drop off from private cars) as outlined in the policy requirements for the allocation. It is accepted that overall there could well be a borough-wide modal shift to using rail for shorter trips which is welcomed and supported, but the concentration of traffic at the proposed access points north and south of the new station is a cause for concern given the congested nature of the local road network.

3.6 The absence of strategic modelling associated of the transport impacts on local infrastructure close to the new station considering the close proximity of the A3 and Egerton Road junctions is a concern. The proposed highway improvements to address capacity issues at these junctions as a result of existing and forecast traffic conditions could result in the current work not providing sufficient capacity to accommodate the immediate impact of the trips attracted to the new station from buses, taxis and private cars.

3.7 With regard to deliverability of the station there is a concern. The Inspector should ensure that Network Rail is satisfied that a new station is technically deliverable and that the costs assumed within the Draft Local Plan 2017 are appropriate. RGP is not aware whether such a statement has been made by Network Rail at the time of writing.

6.2 In relation to the New Rail Station at Guildford West (Park Barn) (Policy A59) the following concerns are raised:

i) The vehicular impact of the Park Barn station on the Egerton Road area has not been included within the strategic traffic model, therefore the true impacts of the scheme are not understood to be included within the detailed mitigation currently being considered;
ii) The deliverability of the station is heavily reliant upon Network Rail and RGP is not aware that Network Rail is in a position to deliver the station within the lifetime of the Local Plan so that the expected modal shift is achievable for all of the reliant development primarily on the Blackwell Farm development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 226389 - Sketch drawing ‘Initial Junction Arrangement’ provided by University of ...,pdf (210 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have the following objections to the proposed development at Three Farms Meadows, Wisley, and to the Guildford Borough Council Local Plan. Please confirm that all of these comments together with all my previous comments have been passed to the Inspector.

1. I object to the inclusion of Three Farms Meadows in the draft Local Plan for a number of reasons including:
   • It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
   • It is further from railway stations than any other identified strategic site.
   • It is close to one the most congested junction in the country (M25 Junction 10).
   • Local roads are at capacity particularly when the SRN is not free-flowing.
   • Any public transport (bus) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs.
   • It is adjacent to the most popular visitor attraction in the south-east, RHS Wisley, where visitor numbers are increasing every year.
   • There is insufficient employment available locally so that almost all residents will have to travel to work.

1. I object that the increased area, being on the south of the site facing the Surrey Hills AONB, will increase the negative impact of the views from the AONB.

2. I object to the removal of additional 3.1 ha from the green belt without any justification.

3. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

4. I object to the fact that the Council has failed to remove this site from the local plan despite thousands of objections from local residents and statutory consultees.

5. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A Regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

6. I object to the extension of the plan period by one year as it has not been identified as a major change.

7. I object to the inclusion of a 10% buffer in the housing number over the plan period as unnecessary.

8. I object to the housing number and I believe that the housing number is poorly based and open to legal challenge.

9. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development.

I object to the Council wasting the time and money of tax payers and local residents by not following due process and ignoring previous representations. I consider, for the reasons listed above, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to the proposed insetting around Send and Send Marsh.** If the new insetting boundary is adopted, then the land and all the surrounding fields for several miles around our village, by default, will become available for development and building, attracting builders to develop and build on large swathes of open countryside.

This is a completely irresponsible and reckless policy with no regard to co-ordinated planning and will lead to an out of control building frenzy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3981  Respondent: 17440705 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **I object to removal of Brownfield sites (A4) from the Plan**

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

1. **I object to removal of Brownfield site (A34) from the Plan**

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a 'brownfield first' approach” (page 5) and makes out this is an important aspect of the plan but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3977  Respondent: 17440705 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A42 Pages 241-2

I object to the proposed increase of a further 16 houses on the Clockbarn Nursery site. This is a totally unsuitable site anyway for a high density development. Increasing the number of houses completely exacerbates the situation.

Traffic movements from the site coupled with traffic accessing the new Marina development and then trying to join Send Road would cause considerable problems for residents and through-traffic alike. Access from Tannery Lane to Send Road is very limited and trying to join it, particularly at peak times, would be extremely difficult.

Send Road is already used to capacity by traffic heading to and from Junction 10 on the M25 and is used as a rat run off these roads. Send Road was never intended to be used by today’s very large articulated trucks.

The essential traffic islands to enable pedestrians to cross represent an additional hazard plus the increasing number of cyclists exposed to rising levels of exhaust pollution.

Access from the opposite end of Tannery Lane is through very narrow roads with limited passing areas which will render this access effectively impossible. This means that traffic from the Marina and the Clockbarn Nursery site would be forced to come and go via the Send Road junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3978  Respondent: 17440705 / Chris Brown  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Garlick’s Arch (A43) proposed changes to this site which in combination would generate considerable activity in a most unsuitable location.

Pitches designated for Show People suggests large vehicle traffic movements and a further extension to the commercial premises that have already been added on that side of the road all of which is located in close proximity to the surrounding residential area.

Increasing the number of houses would mean a truly massive increase in the volume of traffic which will only be able to use the A3, Send Road and travelling through Ripley, all of which are unsuitable for the level of traffic associated with such a development.

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause log jams of these villages.
Garlick’s Arch (A43) should not be extended or even developed with the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Show people sites in A34 Garlick’s Arch

The allocation of 6 Travelling Show people plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Show people plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch

I further object to the Garlicks Arch site because if A58 Burt Common site and development at Gosden Hill Farm is also granted then the A3 corridor from Burpham to Ripley will be over developed and it will simply join up a sprawling set of developments. These in turn will lead to greater traffic density, slower journey times as well as increasing safety concerns for an infrastructure which cannot support this level of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3983</th>
<th>Respondent:</th>
<th>17440705 / Chris Brown</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The plan lacks any infrastructure proposals to support all the development. There are no proposed plans to upgrade roads or introduce new roads or links, and it is simply a plan of building additional housing and commercial facilities but expecting the current road system to support more traffic which it is incapable of doing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3980</th>
<th>Respondent:</th>
<th>17440705 / Chris Brown</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough.

Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt.

This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

1. POLICY A58

I object to this proposal A58 Burnt Common which is not defined and therefore open to interpretation. Any development of that type and on that scale will again impact the road infrastructure on the edge of two villages, Send and Ripley. In any case the need for them is unclear especially when there seems to be spare capacity at Slyfield industrial estate which is much more appropriate and already an established industrial estate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the proposal for a Waste Management Facility in Green Belt (A58)

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

There are clearly serious pollution issues to be considered as well as a massive increase in commercial traffic bringing the waste in and out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2035  Respondent: 17440705 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

If the developer simply builds the development they want and then makes a cash payment to the council for the affordable houses the developer does not build, how does this help Guildford Borough Council build affordable housing? This would appear to prejudice the younger generation and those needing this urgently sought type of housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2036  Respondent: 17440705 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to removing Send Business Park from the Green Belt (4.3.15).

Send Business Park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one.

Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

If further development is made on this Business Park then the same points arise as those made earlier for point 1, Clockbarn Nursery site with regard to traffic issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/377  Respondent: 17440705 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

1. GENERAL OBSERVATIONS

The latest proposed plan is considerably worse than the previous plan and I am very disappointed in GBC and I’m much more critical of the Local Plan proposals.

As residents of Send Marsh, we share the same views of that of our neighbours in Send and Ripley. Every time we are asked for our opinion we make it very clear by way of a massive response that so many of the proposals are ill conceived and impractical to apply in our particular area.

GBC seems to be either unwilling or unable to act upon the feedback and opinion which is so clearly voiced by the residents.

We in Send Marsh have repeatedly expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before plus an additional eight Show people pitches.

The Conservative Manifesto for GBC states:

“Deliver a new Draft Local Plan taking into account constraints, residents’ views and protecting the green belt”.

It would appear that for the villages of Send, Send Marsh and Ripley, GBC are failing on two of these;

Failing to take into account residents’ views

and

Failing to protect the green belt.
This continual disregard of local public opinion is very disappointing and GBC needs to create a significantly better plan than this one for the area we live in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2073  Respondent: 17443201 / Mark Squibb  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 – Countryside. Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road. Countryside within the urban area may be allocated as a strategic location for development, however suitable infrastructure must be implemented before further development. Our roads are single lanes in many cases with poor road surfaces, associated traffic volume including delivery vans & lorries servicing these new properties. Congestion & bottle necks particularly school peak times. Our countryside, loss of natural habitat and the rural setting under threat of being over developed. Awareness of Tree Preservation Orders and to highlight Listed Buildings & homes.

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside) Therefore Requirement 6 of this Policy, which attempts to protect the ‘historic location of Ash Green’ is inadequate and would need rewording to prevent this increased potential for coalescence.

Development proposals in the vicinity of Ash Green must recognise the historic location of Ash Green village. The listed building the trees with Preservation Orders. Any development as a whole should not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a substantial green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane.

We need to sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house. Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.

Infrastructure before development. Requirement 9 (land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of Policy A29 commences.

Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction

Policies A27, A28 and A29 collectively increase Ash Green village by 50%!!
We will no longer be a village, we will be victims of urban sprawl, losing our village identity forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4008  Respondent: 17443745 / Robert Siaens  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to vehemently object to the proposed plans for Gosden Hill Farm as they currently stand. While Guildford is certainly in need of new homes to help meet national house-building objectives, the proposed plan to build 1,700 – 2,000 new homes on this site, in my mind raises enormous concerns, with most of the new traffic passing through Burpham.

Burpham already suffers considerably from traffic congestion,

- particularly when there is an accident on the A3, which happens all too frequently and clogs up the roads through Burpham and further down with traffic trying to get through Guildford and
- at the London Road/New Inn Lane/Burpham Lane roundabout with traffic queuing to enter the – too small – Aldi supermarket car park, clogging up all adjacent roads.

Unless an efficient new junction with 4-way access to and from the A3 is included, all traffic from any development heading south onto the A3 will have to go towards town to access it, further clogging up Guildford’s already dire traffic problems. Guildford’s traffic problems HAVE TO BE addressed first and foremost to alleviate this awful problem, which is currently reducing the quality of life in this otherwise wonderful town. And all these problems are contributing to a worsening pollution problem in Burpham and Guildford, to which the proposed new housing on Gosden Hill farm will only contribute.

The A3 HAS TO BE sorted out, improvements carried out and, more than anything else, a tunnel planned to eliminate the bottleneck at the Cathedral junction during rush hours or when an accident happens. I consider this to be vital to the traffic flow and consequent wellbeing of our traffic congested town!

I understand that we need new and affordable housing, but for the reasons I have indicated, I object to the Plan as it now stands.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2090  Respondent: 17443745 / Robert Siaens  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Unless an efficient new junction with 4-way access to and from the A3 is included, all traffic from any development heading south onto the A3 will have to go towards town to access it, further clogging up Guildford’s already dire traffic problems. Guildford’s traffic problems HAVE TO BE addressed first and foremost to alleviate this awful problem, which is currently reducing the quality of life in this otherwise wonderful town. And all these problems are contributing to a worsening pollution problem in Burpham and Guildford, to which the proposed new housing on Gosden Hill farm will only contribute.

The A3 HAS TO BE sorted out, improvements carried out and, more than anything else, a tunnel planned to eliminate the bottleneck at the Cathedral junction during rush hours or when an accident happens. I consider this to be vital to the traffic flow and consequent wellbeing of our traffic congested town!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5168  Respondent: 17444833 / Rupert and Jana Phillips  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have viewed the previous Local Plan and current, although there has been a few minor changes to the proposal for Blackwell Farm /University Manor farm/Hogs Back area the current proposal is still in excess of what the road infrastructure and amenities can support. This year has seen an increase in the regular road incidents from the Hogs Back to Cathedral junction on the A3. The volume of traffic attempting enter the business park, Royal Surrey Hospital and university campus has grown dramatically in the past few years. This week whilst in term time has seen Madrid Road from Guildford Station through to past Tesco’s’ roundabout at a standstill. Made worse by the temporary closure of a road at the traffic lights forcing volume to travel by single carriageway. It is along these routes the prosed development at Manor Farm is shown to travel to and from the development, university, Royal Surrey Hospital and Guildford and beyond.

The proposed alterations with new access from Hogs Back will destroy open space and wildlife habitat not to mention an area of outstanding chalk land. For those who live in Onslow Village the pollution will increase as the warm air rises from the lower plain new town, noise levels which are on the increase from the A3 will multiply which will drastically affect the quality of life in the village. Recent decision by Guildford Borough Council to refuse planning approval for new homes and school at Rokers was reported by planning offices as “the application site is located within the green belt where there is a general presumption against inappropriate development “ The application proposes a large scale residential development and a new school both are inappropriate developments Inappropriate developments should only be approved where there are very special circumstances which clearly outweigh the harm that would be caused by the development “ the report goes on to say “In addition to the harm to the green belt the report identifies significant harm to the character of the area “ Those comments are even more applicable to Blackwell Farm/Hogs back.
When we moved to Guildford 11 years ago the traffic on the A3 would generally be noticed about 6:30 am now there is only respite between about 1 am to 4:00 am. Any development should only commence when road infrastructure and if approved rail improvements are completed. The Park & Ride at the Surrey Sports Park is under used, limited number of road users will divert off the A3 and use the facility. The greater number of cars and delivery vehicles using the single carriage way road will have a big impact on ambulances trying to arrive and depart Royal Surrey Hospital. With increase in commercial premises there will also be a greater number of delivery lorries travelling on the lacking road infrastructure. Many expensive studies have recently been undertaken without achieving a workable solution for the A3 or town centre gyratory.

With the increase volume of traffic on the Hogs Back/A3 many drivers now use Onslow Village as a rat run leaving at High View Road or the Chase travelling at speed through residential areas with infants and junior schools located in the village. Resulting in deterioration of the public highway especially in Manor Road. Should development proceed this situation will only get worse.

The previous Local Plan study of numbers of additional persons and home requirements was found to be inaccurate, the suggested numbers are guess work based on increase in students at Surrey University, possible new businesses based on the manor farm development and growth in current local population wishing to buy homes in the borough. The apparent need for commercial development in my opinion should be concentrated at Slyfield where with the proposed new road structure would reduce large volumes of traffic from the west of Guildford in particular the hospital/university and already grid locked A3/A31 and Farnham Road. The proposed Slyfield Road links close to the A3 junction Northbound which would divert heavy goods vehicles away from residential areas and Guildford town centre roads.

Surrey University has more than sufficient land to develop for students approvals have yet to be commenced when built would reduce demand for rented property in Guildford making available for local workers and families. The University should develop their land before any “Developers” bonus from sale of Blackwell Farm is paid into their coffers. Areas such as the open air car parks empty for long periods throughout the year, these car parks could be redeveloped with under ground parking to meet demand with student accommodation in blocks of up to 5 storeys high which would not be detrimental to area. Students on site Campus with own facilities result less travel or use the park and ride facility. To develop the sites the University would need to raise commercial funding which apparently they are not prepared to consider as it is expensive an no immediate return. By selling Blackwell Farm as residential development land the value would dramatically increase over farmland, they want their cake and eat it !. I appreciate a large number of local residents are employed at the University =more students + greater number of tutors and other employees + more road travel as many will be living in other parts of Guildford but preferring to travel by road for time convenience rather than local transport. The proposed train station is unlikely to reduce dependency on road network due to distance from proposed housing and commercial areas. Will probably benefit hospital staff and patients, although they would first have to travel to their local station and with poor bus services seems unlikely to have large take up.

The land bank already approved by GBC for development the University should be developed before other off campus sites.Surrey University could comfortably develop those locations and increase student accommodation by utilising the open space car parks which are vacant for much of the week and year. By building underground car parks with student accommodation above the land would be put to better use, reduce the volume of traffic and pollution. The University should be asked to seriously consider however there would be the commercial investment required which the University are unlikely to entertain. We believe the University should not be able to increase the number of students recently reported as an increase of 6,00 until they can accommodate students on the various campus, not to the detriment of residents many of whom own their own homes and will see the area West of change for the worse with over development, poor infrastructure and increase noise, pollution and traffic. The change in the environment would not bring any benefits to current residents, we fail to see anything in the Local Draft Plan which enhances the West of Guildford.

The proposed development to the West of Guildford is in excess of what the town requires and with very limited road infrastructure opportunities to dramatically improve the flow through Guildford on the A3 the area of the North Downs will be destroyed. Current problems would not be solved by the planned road layout alterations as the infrastructure is totally inadequate. Despite numerous surveys at great expense no realistic affordable practical proposal has been suggested. Road network must be the key to size of any development at Blackwell Farm. The past two weeks I have found it impossible to travel through Onslow Village to join Madrid Road and head towards A3 the village and surrounding roads grid locked 8:00 -9:30 such issues will increase which has an effect on not just myself but others living in the area trying to get to work. Our quality of life has not been considered in the plan which is driven by seeking unsubstantiated annual housing targets.
Surrey University has more than sufficient land to develop for students approvals have yet to be commenced when built would reduce demand for rented property in Guildford making available for local workers and families. The University should be develop their land before any “ Developers” bonus from sale of Blackwell Farm is paid into their coffers. Areas such as the open air car parks empty for long periods throughout the year, these car parks could be redeveloped with under ground parking to meet demand with student accommodation in blocks of up to 5 storeys high which would not be detrimental to area. Students on site Campus with own facilities result less travel or use the park and ride facility.To develop the sites the University would need to raise commercial funding which apparently they are not prepared to consider as it is expensive an no immediate return. By selling Blackwell Farm as residential development land the value would dramatically increase over farmland, they want their cake and eat it !. I appreciate a large number of local residents are employed at the University =more students + greater number of tutors and other employees + more road travel as many will be living in other parts of Guildford but preferring to travel by road for time convenience rather than local transport. The proposed train station is unlikely to reduce dependency on road network due to distance from proposed housing and commercial areas. Will probably benefit hospital staff and patients, although they would first have to travel to their local station and with poor bus services seems unlikely to have large take up.

The land bank already approved by GBC for development the University should be developed before other off campus sites.Surrey University could comfortably develop those locations and increase student accommodation by utilising the open space car parks which are vacant for much of the week and year. By building underground car parks with student accommodation above the land would be put to better use, reduce the volume of traffic and pollution. The University should be asked to seriously consider however there would be the commercial investment required which the University are unlikely to entertain. We believe the University should not be able to increase the number of students recently reported as an increase of 6,00 until they can accommodate students on the various campus, not to the detriment of residents many of whom own their own homes and will see the area West of change for the worse with over development, poor infrastructure and increase noise, pollution and traffic. The change in the environment would not bring any benefits to current residents, we fail to see anything in the Local Draft Plan which enhances the West of Guildford.

The proposed development to the West of Guildford is in excess of what the town requires and with very limited road infrastructure opportunities to dramatically improve the flow through Guildford on the A3 the area of the North Downs will be destroyed. Current problems would not be solved by the planned road layout alterations as the infrastructure is totally inadequate. Despite numerous surveys at great expense no realistic affordable practical proposal has been suggested. Road network must be the key to size of any development at Blackwell Farm. The past two weeks I have found it impossible to travel through Onslow Village to join Madrid Road and head towards A3 the village and surrounding roads grid locked 8:00- 9:30 such issues will increase which has an effect on not just myself but others living in the area trying to get to work. Our quality of life has not been considered in the plan which is driven by seeking unsubstantiated annual housing targets.

A recent article from the University supporting the development made mention of the expected increase in number of students and the need to house them. The correspondent also commented on the students bringing value to Guildford. They
do not pay rates on properties they rent, some leave mess outside the properties and as I write at end of the year several late night parties disturbing the residents. the situation in respect of rates provides a lost opportunity for Guildford Borough Council the funds obtained could be used to benefit local residents. We believe about 1500 homes plus are rented to students losing the Council in region of 2 million pounds per year in rates revenue. How much does Surrey University contribute in rates for their campus?

There are a number of vacant office blocks which could be converted to residential as demand does not appear to be for commercial occupancy. The Commercial Park at the old Denis site could be relocated to Slyfield and the area developed with multi rise units near to station, town centre and university without having much of an effect as the environment.

Development is required in Guildford however we question the analysis to predict of future growth patterns for a good number of years hence, already reduced on re examination following the previous Local Plan and probably requires further assessment prior to final draft. Any new homes should cater for bungalows, 1 bed, 2 bed back to back starter homes, 2/3 bedroom terrace properties and semi detached, not just the larger 4 bedroom homes, otherwise the young and old of the borough would not have opportunities to buy a first home or down size to free other homes in the borough for the “suggested” numbers moving to Guildford, the town is almost at saturation point for reasons mentioned above. Affordable homes is a miss conception new developments are built by developers to maximise profit not out of goodwill to benefit purchasers.

On a general note with the increase in housing there is limited additional recreational facilities for the normal family who cannot afford to use Surrey Sports Park or the Leisure centre, few open spaces to make up for the loss of natural habitat and open spaces at Blackwell Farm/slopes of the Hogs back, loss of environment and playing fields for football, cricket and such like. Bus routes and park and ride are under utilised the idea public would use and the train station are we believe over rated. The very heavy rain these past two days also raise the question of flooding, the Blackwell Farm site is in the basin below the Hogs Back, presently the run off from road and chalk downs is to the lower farm areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

| Comment ID: | pslp172/4023 | Respondent: | 17444993 / Julian La Lau | Agent: |
|-------------|---------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A46 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

Reference the plans you have for Normandy and surrounding areas I would like to object to some issues.

- Site A46 for 1100 homes and School
- Site A47 for 50 homes

I call for the removal of these plans for a number of reasons including, destruction of wildlife habitat, the inability of the current infrastructure to be able to cope with new demands, ( i.e, roads, waste, flooding, sewage, electrical supply and healthcare)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**
Comment ID: pslp171/2113  Respondent: 17444993 / Julian La Lau  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Removal from the green belt of homes in Guildford Road, northern end of Glaziers Lane, Flexford Farm, Walden Cottages & Palm House Nurseries Traveller site

I object to these homes being placed here primarily due to the fact that it will enable development within the area at a much higher density and will give greater success for planning applications, ultimately giving rise to more developments in our "green belts"

- 10,000 homes within 10 mile radius of Normandy

I object to these homes because they will add further pressure to our roads which are already unable to cope with its traffic demands. It will also have major detrimental implications to our rural environments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4027  Respondent: 17445057 / V. J, A Underhill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to Guildford Borough Council's changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site (Policy A26 & para. 4.1.9).

The proposal will cause irrevocable harm to the beautiful landscape on the edge of the Surrey Hill Area of Outstanding Natural Beauty and destroy Green Belt.

Any increase in development, extending the University's land at Manor Farm, would be inappropriate building growth on Green Belt and in the wrong place. The scheme, together with the proposed access road to the site, linking Guildford to the A31, will cause additional chaos and traffic congestion on the A31 and A3.

I live on the north side of the A31 Hog's Back. Residents in East Flexford Lane have already been affected by the closure of the gap in the central reservation of the A31 at the East Flexford Lane point. Since the closure In March 2017 residents in East Flexford Lane have been cut off from reaching their homes several times with the A31 eastbound towards Guildford being closed to all traffic and westbound during the re-surfacing work and no alternative route. Residents of Wanborough and Normandy were also affected. Due to the closure the fire services had a longer journey to tackle a recent field fire close to our property with large fields of combustible crops putting properties, residents and crops at risk. Residents had asked
for provision for access at the gap for the emergency services to have facilities for such an event. Response times would be even more difficult at peak hours.

No slip roads, acceleration and deceleration lane provision has been made for owners of Properties along the Hog's Back accessing the A31 with traffic travelling in excess of 60 m.p.h. Further increase in traffic will create even more dangers for residents joining traffic at motorway speeds; pedestrians also cross the A31 to access the bus stops. Every weekday morning there is a queue of traffic into Guildford that stretches back for several miles. Adding a junction and proposed access road to the Blackwell Farm site, with proposals for 1,800 houses, a school, medical centre and expansion of the Research Park, will add an extra burden on an already overloaded road system. The impact on the local network and questionable viability of the development (Policy paragraph 2.14a) ignores independent expert traffic studies and common sense.

Already the Tesco roundabout and vital access to the Royal Surrey County Hospital is congested and approval of the University's plans will cause road infrastructure breakdown. The journey to the Hospital for ambulances with patients is already difficult at peak times.

The additional traffic will add to air pollution which already exceeds safe Eurorean Unit limits. When I drive up East Flexford Lane, it is clear to see the fumes rolling off the Hog's Back down the into the fields, especially at morning and evening peak times when traffic is stationary waiting to access the A3. The development will inevitably see the destruction of trees which are the lungs to counter pollution; the new proposed major route would cut through an ancient woodland and remnants of historic parkland.

The University has already covered most of the adjoining Manor Farm with housing, a veterinary centre, sports facilities for international events and an underused Park & Ride.

When the University of Surrey applied to have the Green Belt restriction on Manor Farm removed to enable it to expand its University and Research Park facilities on to this land, it evoked "Special Circumstances". Permission was granted, with assurances from the University to supply the 60% of its student accommodation on its own campuses. Instead the University has failed to implement the Planning Permission to build accommodation for students. Such action could release up to 1,700 local houses to meet local demands.

The University acquired planning permission for accommodation for students in Walnut Tree Close. This site could have provided housing for people working in central Guildford or using the train station, reducing car dependent travel.

The National Planning Policy Framework guidelines make clear the direction that should be followed on Green Belt protection and sustainability. Guildford Borough Council should adhere to this Policy and not approve development on Blackwell Farm for financial gain in the form of the Government's New Homes Bonus. Consideration should also be given to the loss of food production from Blackwell Farm which presently contributes to Britain's self sufficiency.

I trust councillors will honour their election promises and protect the Green Belt at Blackwell Farm by opposing plans to build on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/4029  Respondent: 17445153 / Gillian Brierle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is an inference by GBC that the number of houses in this plan has been reduced but in fact the 1700 homes is only the suggested minimum, not the maximum so there is no change of policy here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp172/5208  Respondent: 17445153 / Gillian Brierle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object that the developer will be unable to "provide the eastern route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the eastern route section on the Local Road Network, both having regard to the Sustainable Movement Corridor Supplementary Planning Document."

The A3100 London Road is the road which will become an SMC carrying both north and south bound traffic; cars, buses, HGVs, motorbikes and bicycles lanes. This is not possible in sustainable in a 2-lane road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2115  Respondent: 17445153 / Gillian Brierle  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although GBC has reduced the number of houses from 693 to 643 per annum there is no information forthcoming, and therefore not the necessary transparency, about how this figure has been reached or why it does not agree with the figure of 404 homes per annum in the independent analysis of the SHMA which was carried out by a respected national expert who worked for the government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/569  Respondent: 17445217 / Philip and Charles Mason-De Freitas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to make comment on the above in respect of West Horsley.

We are very disappointed that the 2017 version of the plan should be almost unchanged from the 2016 version and that most of the 32,000 objections received last time seem to have been ignored. I truly hope the inspector rejects the plan and sends it back for radical reworking. In particular, the calculation of the SHMA remains unsupported as it can’t be tested by either the public or the government because the council refuses to reveal it. Despite this the SHMA methodology is still taken by the council to produce an “objective” housing number assessment. The council is contradictory about how development will be phased and infrastructure and other constraints applied making the final housing number so uncertain as to render this part of the plan unworkable as a practical policy tool for officers responsible for day-to-day planning. No-one knows for sure what number the council is heading towards or how this aligns with public opinion or government...
policy. Policy H1 has deleted constraints on housing density, which ought to be a key part of any planning document. • P1 and E5 have removed the 5 tests for development in the AONB, making it more vulnerable to development, in contradiction to government policy and promises made by the council leadership since the 2016 consultation. • The plan still contains a multi-pronged assault on the Green Belt. Building on the Green Belt in West Horsley would have zero effect on house prices, since it would make no impact on the national supply/demand balance, the local overhang from London or the availability of cheap credit, e.g. to overseas buyers. It would discourage the regeneration of urban areas where many people wish to live and instead wants to promote more shops when the national and international trend is for less town centre shopping and more internet and delivery. There is infrastructure already in place in the town to support housing. This plan seems to see a suburbanised countryside with a decaying town centre in its centre.

The following comments relate to my local area that features in Sites A36-41 (East and West Horsley): The latest version of the plan reduces the number of development sites here by 2, but 4 remain, representing 395 new homes. This is too many in absolute terms, and disproportionate in relation to the rest of the borough. In my view, the plan is unsound in failing to assess the aggregate impact of these sites, along with the 2,000 homes planned for Site A35 only 2 miles away, in effect leaving the Horsleys as vulnerable to piecemeal planning applications as they are without a local plan in place. By not setting any development boundaries, the “plan” fails to plan this important part of the borough’s future size or shape in a useful or meaningful way. The plan fails to mention most of the known sustainability and infrastructure problems affecting the Horsley sites, which were fully explained in the public responses to the 2016 consultation. These include public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. The density of new housing on the four Horsley sites is too high, being greater than anywhere in the locality at present. Sites on the edge of existing development in the Horsleys trespass on the open countryside and require big extensions in settlement boundaries. Taken together, the 4 Horsley sites conflict with NPPF para. 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. In order to survive, these assets require a local plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are integral to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2117  Respondent: 17445345 / Albury Parish Council (Joanna Cadman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 14 Para 2:13 Transport and Accessibility – Cycling

Albury Parish Council notes that no mention has been made of the increasing number of cycle events that take place in the Surrey Hill since the 2012 Olympics. Some, like Ride London, are organised events but many are not and most cause road closures, some for an entire day, over a large network of roads in the Borough. This has a negative impact on local residents who cannot access local facilities, and for those dependent upon social care in their homes or in need of emergency services. Competitors also use local roads to practice for events which slows the through flow of traffic substantially. Many local roads are no more than the width of one car. With increases in housing in the Borough this will inevitably attract more people to the Surrey Hills to pursue cycling as a leisure pursuit and as a means of transport to school
and work. There must be infrastructure improvements to the roads to allow for the increased number of cyclists in the 
Surrey Hills such that local residents, visitors and businesses are not inconvenienced and road closures are unnecessary.

Page 16 Para 2:22 Infrastructure

Albury Parish Council request the retention of paragraph 2:22. Although Infrastructure is covered in more detail later in the 
Plan, the need for investment in improvements to Infrastructure cannot be underestimated and it is vital that this occurs at 
the same time as increases in housing and commerce.

Pages 19 and 20. 2 Maps. Map-Guildford Borough Key diagram 2016 and 2017

Albury Parish Council remains opposed to any changes to the Green Belt boundary and the removal of villages including Chilworth and Shalford, East and West Horsley from it. These areas including Gosden Farm in Merrow and Wisley 
airfield are all areas designated for “strategic development in the plan” with large numbers of new housing proposed. The 
Green Belt has always been afforded protection to prevent urban sprawl. Any additional building and traffic generated by 
areas now “inset” and other areas of Guildford Borough and Waverley Borough allocated for new build will have a 
negative impact on the natural quality and existing infrastructure of the retained areas of Green Belt, Albury Parish and the 
Area of Outstanding Natural Beauty of the Surrey Hills. These areas would need substantial investment in roads, buses and 
cycle routes to accommodate increased commuter and visitor numbers. The A248 on which Albury sits is the main road 
artery connecting south east Guildford, Cranleigh, Godalming, Shalford and Chilworth via the A25 with the A3 north of 
Guildford and vice versa. It also provides connection with the train line running from Guildford to Waterloo via West 
Clandon, Horsley and the newly proposed Merrow train station. The A248 in Albury simply cannot cope with increased 
traffic volume. Without careful planning to accommodate this, which is not included in this document, the increased traffic 
caused by new housing will have a detrimental effect on the Green Belt, Area of Outstanding Natural Beauty and Albury 
village and parish all of which are protected by planning policy and the NPPF. Please see further comments on 
infrastructure policies 4:6.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2128  Respondent: 17445345 / Albury Parish Council (Joanna Cadman)  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally 
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We request that the following bullet points that have been deleted are retained. These are important to Albury and its outer 
lying hamlets which have a well-defined character, with many buildings constructed of local stone. We believe the 
retention of these guidelines will better inform householders, developers, builders and architects to protect and preserve 
Albury Conservation area and environ, buildings of note and Conservation areas in the Borough. These are:

- Respond meaningfully and sensitively to the site, its characteristics and constraints and the layout, grain, massing 
  and height of surrounding buildings.
- Be laid out to make the best use of the natural features such as trees and hedges and levels and enhance views 
  into and out of the site
- Promote and reinforce distinctiveness
- Use material appropriate to setting
Retain deleted wording for the same reason as stated under page 106 Policy D

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/2121  **Respondent:** 17445345 / Albury Parish Council (Joanna Cadman)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

**Page 37-38 4:2:3 and 4:2:9 Housing**

Although the borough identifies the need for building smaller dwellings, developers prefer to build larger dwellings where their margin is greater. Therefore, in its current form the Plan does not provide any guarantees that it can deliver smaller housing that is needed.

**Page 38:2:8**

This paragraph should be retained. Respecting density especially existing street patterns, plot sizes and space around buildings is key to preserving the character of our villages and towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/2122  **Respondent:** 17445345 / Albury Parish Council (Joanna Cadman)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

**Page 46 4:2:40 Affordable Home**

Albury Parish Council recognises the need for Affordable Homes but in order to deliver them it is vital that Guildford Borough Council has firmer controls on developers who flout viability as a reason to avoid building affordable homes. In our view the current wording in this section is too weak.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We expect that Albury Parish Council would designate any sites it felt viable for rural exception homes within our Neighbourhood Plan and that these and any affordable housing would be subject to any Green Belt and AONB planning policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

We support policy IDI (3) that states that improvements to infrastructure must go hand in hand with development and not lag behind, though this statement is contradicted in the Plan under point 4:1:9 which states that infrastructure changes won’t happen until the end of the plan in 2033-34.

We ask that Guildford Borough Council in its plans for infrastructure are mindful of building in nearby Boroughs including Waverley, and their impact on resources. Substantial new housing is to be built at Cranleigh, Dunsfold airfield, and Godalming. This will impact Albury adversely if commuters and visitors to the AONB are allowed to use the A248 in its current site running through the centre of Albury village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Albury Parish Council strongly objects to the proposed changes to the wording in paragraphs 1 and 4. Specifically, we request that the newly added text is retained in addition to any deleted text. It is imperative that this stronger wording is kept unchanged in order to protect the AONB. The new proposed text is too vague and open to abuse. The AONB was defined in the National Parks and Access to the Countryside Act 1949 and as such has always been offered special protection. The AONB exists in its current unspoilt form today only because of stringent planning policy restrictions in the past. These must be retained for continued protection and all existing boundaries similarly retained.

Points 2 and 3 should be retained as shown. In Point 5 the AGLV boundaries as currently set should be retained in order to protect the AONB.

Page 52 4:3:5 and 4:3:6

should be retained in their original unamended form as they offer greater protection to the AONB.

Page 53 4:3:8

The AGLV must be retained with its current boundary to protect the AONB, particularly as not policy has been written yet to protect it under the Development Management Policies DPD. No review can take place until this is in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

4:1:9

Albury Parish Council objects to the proposed development at Gosden Hill Farm and former Wisley airfield as specified in our objection to point 3:1 above.

Page 30 4:1:9a

It is disappointing to see that the delivery of necessary infrastructure to support new housing is not expected to occur until towards the end of the planned period in 2033/34. Albury Parish cannot sustain increased traffic volumes caused by new housing and business in the Borough as recommended in the Plan. Infrastructure improvements must be completed in line with development. Most homes have at least 2 cars which will bring an additional 24,852 cars onto the Borough’s roads.
The Plan contains no improvements to roads, (particularly the A248), buses or cycle routes through Albury Parish and any that were made would have to be in place before new homes were occupied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2118  Respondent: 17445345 / Albury Parish Council (Joanna Cadman)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Albury Parish Council objects to the current proposal to build 12,426 homes in Guildford Borough by 2034 because of the adverse effect that it would have on Albury Parish, the Green Belt and Area of Outstanding Natural Beauty. In particular we object to the lack of improved infrastructure for the Parish of Albury in the Plan. Albury sits on the A248, the main artery connecting the south east of Guildford, Cranleigh, Godalming, Chilworth and Shalford to the A3 via the A25, and London-Waterloo train stations at West Clandon, Horsley and the newly proposed station at Merrow (Guildford East). The Plan would also increase visitor numbers to the AONB without additional buses or cycle routes. We cannot support the Plan until this lack of new infrastructure is addressed and this should also include medical facilities (additional hospital and community hospital), Social Care and Emergency Services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2144  Respondent: 17445441 / Helen Patterson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am very disappointed that the revised Local Plan 2017 has not heeded the objections and concerns of residents that were sent to the 2016 Local Plan.

I believe that the new evidence submitted is flawed and that Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character and increased congestion, that cannot be justified in our heavily constrained borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Wisley Airfield and fields lie adjacent to the A3/M25 junction which is a pollution hotspot in Surrey (CPRE) and until air quality at this junction can be brought within legal levels, then proposing the addition of a village and two schools next to the junction seems highly irresponsible and possibly illegal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Green Belt is a policy for controlling urban growth. The idea was developed so as to have a ring of countryside where urbanisation would be resisted, maintaining an area where agriculture, forestry and outdoor leisure could be expected to prevail. The fundamental aim of a Green Belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of Green Belts is their openness.

The Metropolitan Green Belt around London was first proposed by the Greater London Regional Planning Committee in 1935. The Town and Country Planning Act 1947 then allowed local authorities to include Green Belt proposals in their development plans. In 1955, the then Minister of Local authorities around the country were encouraged to protect land around their towns and cities by the formal designation of clearly defined Green Belts, to prevent urban sprawl.

The 2012 National Planning Policy Framework (NPPF) issued by the Government clearly sets out the following purposes (amongst others) for the Green Belt:

- To check the unrestricted sprawl of large built-up areas
- To assist in safeguarding the countryside from encroachment
To preserve the setting and special character of historic towns

How do you reconcile the Wisley Airfield proposal, and the removal of the Horsleys from the Green Belt, with the NPPF’s guidelines above?

It appears that GBC now wants to ignore the very reason for having designated Green Belts around urban areas, and specifically around my village of East Horsley. I strongly **OBJECT** to your proposals.

I hope that the GBC, as our elected representatives charged with representing our interests, will listen to opinions voiced in this fourth public consultation: I wish to strongly object to the proposed Guildford Local Plan 2017 based on the points in this letter.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/402</th>
<th>Respondent: 17445697 / Dorothy M. August</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I am writing to object to the Proposed Guildford Local Plan 2017 and in view of what’s being proposed, it is clear that Guildford Borough Council has not listened to over 30,000 objections to the Guildford Local Plan 2016. The 2017 Plan is substantially the same as the 2016 Plan:

- four of the original 6 housing development sites remain
- potential 2500 houses on the former Wisley Airfield and fields as well as
- Gypsy/traveller pitches
- Employment/retail space
- Two schools all remain unchanged after objections to Local Plan 2016

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp173/587</th>
<th>Respondent: 17446113 / Phil Davie</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1. General Policies relating to Send Parish. Sites (A42, A43, A58)
   - **Traffic levels and associated environmental issues.** I OBJECT to the proposed significant developments in Send because these will increase both traffic movement levels throughout the Parish and the level of traffic related pollutants over wide areas in and surrounding the Parish.

**Housing Numbers:** I OBJECT to the scale of development within Send because the increased number of houses proposed (500 + 2 traveller pitches + 8 Traveller/Showman Pitches/Plots) will grow the number of houses in Send by 25%. This is incompatible with maintaining Send’s current rural nature and cannot be supported by existing infrastructure, including education and medical facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/645  **Respondent:** 17446113 / Phil Davie **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **Process:** I OBJECT to the failure of Guildford Borough Council to recognise and act on the large number of objections relating to proposals for Send and made during the 2016 consultation activity.

1. General Policies relating to Send Parish. Sites (A42, A43, A58)
   - **Traffic levels and associated environmental issues.** I OBJECT to the proposed significant developments in Send because these will increase both traffic movement levels throughout the Parish and the level of traffic related pollutants over wide areas in and surrounding the Parish.
   - **Housing Numbers:** I OBJECT to the scale of development within Send because the increased number of houses proposed (500 + 2 traveller pitches + 8 Traveller/Showman Pitches/Plots) will grow the number of houses in Send by 25%. This is incompatible with maintaining Send’s current rural nature and cannot be supported by existing infrastructure, including education and medical facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4052  **Respondent:** 17446113 / Phil Davie **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Clockbarn Nursery Tannery Lane (Site No. A42)

- **Scale of development:** I OBJECT to the proposed increase from 45 to 60 homes because this area is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. Any increase in development scale will reduce this ambience.
  
  - **Scale of development:** I OBJECT to the proposed increase from 45 to 60 homes because increased development in the area will harm the open aspect of the area and views associated with the Wey.
  - **Traffic Infrastructure Capacity:** I OBJECT to the proposed increase from 45 to 60 homes because increased development in the area will create additional traffic movements which existing very narrow roads and the Tannery Lane/A247 intersection cannot safely support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4253  Respondent: 17446113 / Phil Davie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clockbarn Nursery Tannery Lane (Site No. A42)

- **Scale of development:** I OBJECT to the proposed increase from 45 to 60 homes because this area is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. Any increase in development scale will reduce this ambience.
  
  - **Scale of development:** I OBJECT to the proposed increase from 45 to 60 homes because increased development in the area will harm the open aspect of the area and views associated with the Wey.
  - **Traffic Infrastructure Capacity:** I OBJECT to the proposed increase from 45 to 60 homes because increased development in the area will create additional traffic movements which existing very narrow roads and the Tannery Lane/A247 intersection cannot safely support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4257  Respondent: 17446113 / Phil Davie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land around Burnt Common Warehouse (site no. A58)

- Outside current development boundary: I OBJECT since this development lies outside the existing development outline of the village. It represents ribbon development, loss of green belt land, and creeping development between Send and Guildford.
- Use of Green Belt land: I OBJECT because there are no special or exceptional circumstances identified which justify removal of the Green Belt.
- Industrial use: I OBJECT to the proposed industrial development of a minimum of 7,000 sq. m at Garlick’s Arch because there is insufficient justification contained within the draft Local Plan plus it is not a sustainable development. It is removed from the major population centres in Guildford and Woking necessitating a large increase in public transport services and/or major additional traffic movements for staff travel and business logistics. If there is a need for 7,000+ sq. m of industrial space within the Borough it should be located at Slyfield where there is a 40ha site available, where transport link upgrades are already under way, and where it would be largely welcomed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2157  Respondent: 17446113 / Phil Davie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

General Evidence and Policies

Housing Requirement: I OBJECT to the figure of 654 houses required each year between 2015 and 2034 as being too high. Guildford Borough Council will not publish details regarding how this figure was derived. It therefore remains impossible to support the sudden increase in housing numbers from previous annual figures of 322.

Inset Green Belt land: I OBJECT to the proposed inset of Send Business Park from the Green Belt (Green Belt Policy 2 at Paragraph 4.3.15) because

- This is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. It must be protected from further development.
- The site contains an Area of High Archaeological Potential (AHAP – reference 2003 Guildford Local Plan) which requires significant protection to be continued.
- There are no special or exceptional circumstances identified which justify removal of the Green Belt status.
- Developments in the area will harm the open aspect of the area and views associated with the Wey.
- Access to the site is along very narrow roads which can neither safely support existing traffic nor the additional traffic to be expected both during site development and subsequent use.

Process: I OBJECT to the failure of Guildford Borough Council to allocate housing development proposals evenly among its constituent parts, instead focusing disproportionate development within Send Parish.

Process: I OBJECT to the failure of Guildford Borough Council to recognise and act on the large number of objections relating to proposals for Send and made during the 2016 consultation activity.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2158  Respondent: 17446113 / Phil Davie  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. General Evidence and Policies

   ◦ **Housing Requirement**: I OBJECT to the figure of 654 houses required each year between 2015 and 2034 as being too high. Guildford Borough Council will not publish details regarding how this figure was derived. It therefore remains impossible to support the sudden increase in housing numbers from previous annual figures of 322.

   ◦ **Inset Green Belt land**: I OBJECT to the proposed inset of Send Business Park from the Green Belt (Green Belt Policy 2 at Paragraph 4.3.15) because

   • This is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. It must be protected from further development.

   • The site contains an Area of High Archaeological Potential (AHAP – reference 2003 Guildford Local Plan) which requires significant protection to be continued.

   • There are no special or exceptional circumstances identified which justify removal of the Green Belt status.

   • Developments in the area will harm the open aspect of the area and views associated with the Wey.

   • Access to the site is along very narrow roads which can neither safely support existing traffic nor the additional traffic to be expected both during site development and subsequent use.

   ◦ **Process**: I OBJECT to the failure of Guildford Borough Council to allocate housing development proposals evenly among its constituent parts, instead focusing disproportionate development within Send Parish.

   ◦ **Process**: I OBJECT to the failure of Guildford Borough Council to recognise and act on the large number of objections relating to proposals for Send and made during the 2016 consultation activity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2560  Respondent: 17446113 / Phil Davie  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
</tr>
</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **Inset Green Belt land**: I OBJECT to the proposed inset of Send Business Park from the Green Belt (Green Belt Policy 2 at Paragraph 4.3.15) because
  - This is acknowledged by river users as being part of one of the very few quiet stretches along the Wey Navigation. It must be protected from further development.
  - The site contains an Area of High Archaeological Potential (AHAP – reference 2003 Guildford Local Plan) which requires significant protection to be continued.
  - There are no special or exceptional circumstances identified which justify removal of the Green Belt status.
  - Developments in the area will harm the open aspect of the area and views associated with the Wey.

Access to the site is along very narrow roads which can neither safely support existing traffic nor the additional traffic to be expected both during site development and subsequent use.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2164  **Respondent:** 17446305 / Sybill Jubb  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the 2017 new local plan.

It includes the provision for Guildford to expand by 20% to 25%. In order to meet the resulting development needs, it proposes the release of Green Belt as well as building at very high densities in the town.

This will have significant impact on the town, in particular the destruction of Guildford’s historic and green character, and increased pressures on already stretched infrastructure (in particular from increased traffic).

The Borough must have a local plan and further development is accepted, but it must be based on a realistic assessment of future expansion and housing needs.

The plan allows for a total of 659 new homes per annum (13,893 over the period of the plan) but it seems this target is based on calculations and assumptions that have never been made public. Also, an independent analysis carried out on behalf of the Guildford Residents’ Association (by a respected national expert who worked for the Government) has concluded that these figures are based on an overestimate of future population growth and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.
The planned Gosden Hill development is of particular concern. It will put increased pressures on an area, principally Burpham, which is already blighted by severe traffic congestion and the proposed vehicle access plans do not do nearly enough to address this issue.

The Council has a responsibility to revisit the plan, in particular the basis for making provision for Guildford to expand by 20%-25% and the projected housing needs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2165  **Respondent:** 17446433 / Clive Phillips  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Please find below my comments on the proposed revised local plan.

a) No changes are being proposed since the 2016 Consultation to insetting West and East Horsley from the Green Belt.

b) Flawed evidence continues to be relied on to justify over expansion

c) No improvements proposed for sustainability and to infrastructure for the proposed development sites in the Horsleys. Already heavily congested and very poorly maintained, local roads will become gridlocked.

d) The Green Belt should be protected for everybody's future - and development sites can and should be utilised within the town centre rather than retail space.

I trust that you will seriously consider my comments

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2179  **Respondent:** 17446497 / Maggi Moss & Patrick Daffarn  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Please see below our response to the final Guildford Local Plan consultation:

1. Plans to expand Guildford by 20 to 25% appear to be based on an error. In view of this flawed new evidence, Guildford’s proposal for more than 12,426 homes, plus a buffer of 1,155 homes, is excessive and will result in needless loss of Green Belt and the green character of the area in addition to increased congestion that cannot be justified in our already heavily constrained borough.

2. There is compelling evidence that Guildford’s population growth has been greatly overestimated by about 40% because of under-recording of students leaving at the end of their studies.

3. If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

4. Allocating too much land for development in the 2017 Plan and releasing so much Green Belt for development could result in Guildford being required to provide for Woking’s unmet housing needs on our Green Belt thus sacrificing our Green Belt to protect that of Woking. This is folly given the existing constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB. We do not need to sacrifice so much Green Belt or allow town cramming.

5. Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the Plan period.

6. The revised proposal that only 60% of full time Guildford based students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

We support the need for a Plan but not one based on flawed figures, inadequate infrastructure and destruction of Guildford’s green character. The Plan needs to be reconsidered.

We hope you will take our responses into consideration in the final consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:  pslp172/4057</th>
<th>Respondent:  17446625 / Education and Skills Funding Agency (Douglas McNab)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent:</td>
<td></td>
</tr>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
</tr>
</tbody>
</table>

1. The ESFA supports the clarification of requirements regarding secondary school provision in policies A25 and A26; and the clarification of requirements for developer contributions towards education provision in policy A29.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:  pslp172/4058</th>
<th>Respondent:  17446625 / Education and Skills Funding Agency (Douglas McNab)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent:</td>
<td></td>
</tr>
</tbody>
</table>
1. The ESFA supports the clarification of requirements regarding secondary school provision in policies A25 and A26; and the clarification of requirements for developer contributions towards education provision in policy A29.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2184  Respondent: 17446625 / Education and Skills Funding Agency (Douglas McNab)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comments on proposed changes to the Local Plan Approach to Schools

1. The ESFA is supportive of the proposed changes to the Local Plan with regard to planning proactively for the provision of new schools.
2. The ESFA welcomes the addition of para 4.6.49a recognising that national planning policy requires great weight to be given to the need to create, expand or alter schools to meet the needs of existing and proposed communities. This was a point we highlighted in our response to the 2016 consultation document.
3. The ESFA supports the clarification of requirements regarding secondary school provision in policies A25 and A26; and the clarification of requirements for developer contributions towards education provision in policy A29.
4. The clarification of education infrastructure requirements, including delivery agents, costs and funding sources in the Infrastructure Schedule (Appendix C) is also supported. This is important to ensure that developers have a clear understanding of the requirements placed on them to deliver this critical supporting infrastructure. It also provides clarity for the Local Education Authority and Department for Education as to what infrastructure is anticipated to be needed and when, aiding a coordinated approach to forward planning and delivery.
5. Lastly, the ESFA welcomes the addition of a reference to the council’s ‘Education Review’ document (May 2016) in the Evidence base section (Appendix D), a key evidence base document that we highlighted in our previous comments. If this is updated prior to the Strategy and Sites examination we would request sight of this once published.

Conclusion

1. I hope the above comments are helpful in shaping Guildford borough’s Local Plan, with specific regard to the provision of land for new schools.
2. Please notify the ESFA when the Local Plan is submitted for examination, the Inspector’s report is published and the Local Plan is adopted.
3. Please do not hesitate to contact me if you have any queries regarding this response.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4060  Respondent: 17446689 / Camilla Lawrence  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector.

I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

- It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
- It is further from railway stations than any other identified strategic site.
- It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
- Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
- Any public transport provision such as bus services to/from Guildford will have to negotiate the overcrowded SRN and will therefore be unreliable and subject to frequent delays.
- Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
- It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
- The associated traffic increase from the RHS has not been taken into account.
- The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
- There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
- The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
- It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
- The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
- Opportunity (3) should be common to all sites and is not unique to this site
- I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
• I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
• I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
• I object to the removal of additional 3.1 ha from the green belt without any justification
• I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
• I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
• I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
• I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
• I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
• I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
• I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
• I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
• I object to the extension of the plan period by 1 year as it has not been identified as a major change
• I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
• I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
• I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
• I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
• I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
• I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
• I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
• I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
• I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
• I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am extremely disappointed by the response to the vast number of objections regarding the planned number of houses to be built in the Green Belt received during the last consultation. Whilst almost 2000 house have been removed it still leaves a very large number of dwellings in the Green Belt.

Together with the plan to build far more houses than is either required or is sustainable in many areas of the borough, it is unacceptable and hypocritical to begin the plan with the fallacious comments about protecting the precious Green Belt.

This, together with the changes made in the current plan means the Eastern side of the borough is now scheduled to take an even greater share of new homes in the Green Belt. The plan to build surplus houses in this area makes it probable that this over provision of homes would be acquired by Woking residents and not Guildford residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The draft local plan should not be submitted as it stands because the housing number used is clearly unsound. No acceptable justification for removing Green Belt protection has been demonstrated. Constraints for infrastructure and Green Belt should be applied but the draft local plan fails to do this. In my opinion the draft local plan as a whole is unsound.

When the responses to the last consultation were published mine was missing and other comments appeared under my name. It took several weeks for this to be corrected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4071</th>
<th>Respondent: 17447297 / T Scott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond.”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp171/2204  Respondent: 17447297 / T Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

- **4.3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

- **4.3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

- **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to
make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4069  Respondent: 17447329 / Justin Rowland  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

Clockbarn Nursery, Tannery Lane, Policy A42
Now 60 homes in place of 45 homes previously
I object to the Policy A42 change at Clockbarn in Tannery Lane because:

• The increase to 60 homes in place of 45 homes is 33% more and too much]
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse
• It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4070  Respondent: 17447329 / Justin Rowland  Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>
Land at Garlick’s Arch, Send Marsh, Policy A43.
Now 400 homes and 6 Travelling Showpeople plots
I object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth I
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4073  Respondent: 17447329 / Justin Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58.
Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing
I object to Policy A 58 at Burnt Common because:

- It was deleted from the 2014 draft because of all the objections made previously
- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land.
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2206  Respondent: 17447329 / Justin Rowland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

Green Belt, Policy 2 at paragraph 4.3.15
Send Business Park now taken out of the Green Belt altogether
I object to the proposal to inset Send Business Park from the Green Belt because:

- With the new Marina planned on the Wey navigation, removal of this area will facilitate the total erosion of the greenbelt in this area through the infill of further buildings in the future.
- It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
- There is highly restricted vehicular access along Tannery Lane in both directions as well as limited access to the already busy Send Road.
- Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2290</th>
<th>Respondent: 17447329 / Justin Rowland</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
</tr>
</thead>
<tbody>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
</tbody>
</table>

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I must illustrate the additional impact on other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/408</th>
<th>Respondent: 17447329 / Justin Rowland</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I am writing to object to the latest draft local plan. I note that you are only accepting comments to the changes versus the previous plan, so I would ask you to read my comments below in conjunction with those that I have already written to you about in 2016, when you published the previous set of proposals. I have attached a copy of this letter for your ease of reference.

I have been a resident in Send for over 15 years and have seen how strongly local people feel about the proposed changes to our village. This included raising a large proportion of the objections to the previous plan as well as electing two Borough Councillors who primary objective is to save Send’s Greenbelt status. However, it appears that none of these objections have been taken into account at all. If anything Send seems to have been unfairly penalised for this activity with the inclusion of even more development in the latest version of the plan, making things even worse for our village.

Overall the proposed changes will have a huge detrimental effect, with particular impact on traffic and other facilities, in addition to the removal of the irreplaceable Greenbelt protection that parts of our village enjoy. I must illustrate the additional impact on other infrastructure from other proposed developments such as Gosden Hill, which will compound the issues with local roads and other facilities which are struggling to cope with the local population as it is. In addition, there appears to have been minimal effort to development existing brownfield sites in and around Guildford. This is evidenced by recent redevelopment of land such as the old Fire station and the Waitrose in the centre of Town. Both these sites, and many others, could have been used for residential development instead of more retail space, with far less impact on the local infrastructure and none of the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Correct title of Policy A28 to say *Ash Green*, and not *Ash*.

Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site.”

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Correct title of Policy A28 to say Ash Green, and not Ash.

Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site.”

Attached documents:

Comment ID: pslp172/4077  Respondent: 17447425 / Jonny Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A29: Land to the south and east of Ash and Tongham

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp171/2209  Respondent: 17447425 / Jonny Scott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

• 4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

• 4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

• Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to
make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Comment ID: pslp171/2224  Respondent: 17452289 / Chris Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Right now, Guildford is near to full. Congestion in the town centre, and on all roads leading to it, is legendary particularly at peak times. It will only take a very small increase to tip the scales and make it horrible. At peak times it is already common for appointments to be missed, and for people to abandon their trips. Adding over 13000 more homes will make that so much worse still, effectively wrecking Guildford as a quality place to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: pslp172/4401  Respondent: 17452673 / Philip and Maureen Blunden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If
this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/4402</th>
<th>Respondent:</th>
<th>17452673 / Philip and Maureen Blunden</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>()</td>
<td>is Sound?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>is Legally Compliant?</td>
<td>()</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
</tr>
</tbody>
</table>

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residual sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4404</th>
<th>Respondent: 17452673 / Philip and Maureen Blunden</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. I object to Policy A.58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2226  Respondent: 17452673 / Philip and Maureen Blunden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of flawed projections, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion that cannot be justified in our heavily constrained borough. There is evidence Guildford’s population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies. If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford, and also aggravate congestion.

Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB. Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period.

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/2829  **Respondent:** 17452673 / Philip and Maureen Blunden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

---

**Comment ID:** pslp17q/534  **Respondent:** 17452673 / Philip and Maureen Blunden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp172/4081  **Respondent:** 17452865 / David White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest possible terms to the following policies within the Draft Local Plan:

Policy A22 - Land North of Keens Lane

Policy A26 - Blackwell Farm

I do not believe that constraints have been properly applied to the Draft Local Plan in terms of the AONB, SPA/SSSI of Whitmoor Common, Green Belt, transport implications, flooding from surface water, lack of infrastructure, vehicular emissions and the proposed use of high grade agricultural land in accordance with paragraphs 112, 119 and 166 of the NPPF.

The SHMA numbers used by G L Hearn appear to be inflated due to discrepancies in the student numbers. This vital piece of the Evidence base appears to be fundamentally flawed.

Guildford is being targeted as a growth hub, but due to the town's topography and the numerous planning constraints which should, but have not been applied, I do not consider the proposed plan to be sound.

---

**Comment ID:** pslp172/4082  **Respondent:** 17452865 / David White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object in the strongest possible terms to the following policies within the Draft Local Plan:

Policy A22 - Land North of Keens Lane

Policy A26 - Blackwell Farm

I do not believe that constraints have been properly applied to the Draft Local Plan in terms of the AONB, SPA/SSSI of Whitmoor Common, Green Belt, transport implications, flooding from surface water, lack of infrastructure, vehicular emissions and the proposed use of high grade agricultural land in accordance with paragraphs 112, 119 and 166 of the NPPF.

The SHMA numbers used by G L Hearn appear to be inflated due to discrepancies in the student numbers. This vital piece of the Evidence base appears to be fundamentally flawed.

Guildford is being targeted as a growth hub, but due to the town's topography and the numerous planning constraints which should, but have not been applied, I do not consider the proposed plan to be sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

|-----------------------|--------------|-------------|---------------------|--------|-----------|---------------------------------------------------------------|

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed increase in the number of homes from 45 to 60 (33%) is far too great. It merely ignores the previous objections made by local residents and fails to take any account of the serious problems which will result.

It will greatly worsen traffic and access problems both in Tannery Lane and at the junction of that road with the A247.

It will greatly increase the erosion of the Green Belt in the village. Guildford MBC appear to me to have a pre-determined agenda to build upon the Green Belt without taking into account the fact that the infrastructure existing is totally inadequate to cope with such development.

Currently there are problems in the area so far as surface water flooding is concerned. The current proposals will increase these.

Open countryside views from the River Wey Navigation will be seriously worsened. The original purpose of Green Belt legislation was to protect the environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

|-----------------------|--------------|-------------|---------------------|--------|-----------|---------------------------------------------------------------|
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Again, this merely ignores previous objections. The proposed changes make no attempt to take any account of valid objections made to the original Plan.

There is absolutely no evidence of any demand for Travelling Showpeople plots in this area.

It is currently permanent Green Belt land and no "exceptional circumstances" exist to justify its development, as required by legislation. This is woodland that has existed since the time of Elizabeth 1 and the proposed scale of development is excessive; too many homes are proposed - these proposals would merely lead to over-development which current infrastructure is incapable of catering for.

The proposals would effectively join up Ripley and Send. One of the original principles of Green Belt legislation was to prevent such sprawl.

The area is currently adversely affected by flooding and is a flood zone 2 allocation. The current proposals will exacerbate this.

The area is affected by lead shot which has reached serious levels, having accumulated over the last 50 years.

The proposed development will cause serious traffic congestion; current roads are inadequate to handle the level of vehicular movement which will inevitably be generated and local roads in Send and Ripley will be blocked up as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/4088</th>
<th>Respondent:</th>
<th>17454209 / C E Noble</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This proposed development was deleted from the 2014 Draft Plan because of all the objections made then; it beggars belief that it has now been re-adopted. In the 2016 Plan a "maximum" level of development was proposed. The current document proposes this to be a "minimum" level, despite the fact that since than the level of demand for industrial development land has declined significantly.

The above decline is evidenced by the preponderance of empty development sites and vacant units at Slyfield and Guildford. There is no need to allow further industrial development on Green Belt land.
The 2017 Employment Needs Assessment shows a reduction in demand to 3.9 hectares for industrial land in the Borough as a whole. I can see no justification whatsoever for including an additional 10 hectares of Green Belt land at Send in the current Plan.

As well as flying in the face of Green Belt legislation by helping to join up Send and Ripley, the current proposals will generate traffic levels which current roads are totally inadequate to handle. This will result in serious levels of congestion, if not gridlock.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2250  **Respondent:** 17454209 / C E Noble  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object very strongly to the proposal to inset Send Business Park from the Green Belt in totality.

It is essentially a land use which does not conform to existing legislation in an area of outstanding countryside adjacent to the River Wey Navigation. Further development here will mean continued environmental deterioration contrary to the original purpose of Green Belt legislation.

In any event, in addition to the environmental ill effects that would result from further unnecessary development (see above regarding level of demand) Tannery Lane is totally incapable of handling the increased traffic that would be generated by any further development here.

As a general comment upon the proposed changes I would say that this part of the Borough has been targeted in a disproportionate manner and fails to take any account of the fact that the current infrastructure (roads, schools, medical and recreational facilities) are totally inadequate to handle the proposed nature and scale of proposed development, a significant proportion of which appears to me to be totally unnecessary in any event.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp171/2251  **Respondent:** 17454305 / Heather Alexander  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---
The draft plan still proposes that 57% of new housing will be built on land that is currently categorised as Greenbelt, land that was supposed to be protected for future generations to be used for the enjoyment of many (not just local residents). This protected land will be lost forever and the development proposed will simply allow the spread of Greater London, please for the sake of current and future residents and visitors to the area consider the views of the many.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4099</th>
<th>Respondent: 17454433 / Landowners Consortium Wisley (Sir or Madam)</th>
<th>Agent: CBRE (jonathan stoddart)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()


CBRE Ltd and Strutt and Parker act on behalf of a consortium of landowners who, between them, legally own the land identified within the appended location plan – see Appendix 1. The landowners that make up the consortium include: the Harris’ (Land at Bridge End Farm); the Matthews’ (Land at 2 Yew Tree Cottages); and the Fieldings (Land at Little Upton). Within these representations, we refer to this consortium of landowners as the ‘Client’.

Our Client’s land comprises predominantly agricultural fields, with agricultural buildings and dwellings. It extends to approximately 20 hectares in area and is located between Ockham Lane and the former Wisley Airfield.

This letter sets out the relevant background to this consultation, and our Client’s representations in response to the Proposed Submission Local Plan: strategy and sites’ (2017) consultation.

**Background**

Our Client’s land falls within the strategic allocation for the Former Wisley Airfield (Policy A35).

The principle of introducing a new settlement at Wisley Airfield initially emerged through the preparation of Guildford Borough Council’s (‘GBC’) evidence base: Green Belt and Countryside Study, Volume V (April 2014). Since then, strategic allocation A35 has been developed as part of the preparation of the Local Plan. The planning preparation process and associated evolution of strategic allocation A35 is summarised below.

The landowners who make up the consortium we currently represent have independently submitted representations to previous consultations in the plan making process. These representations are included at Appendix 2.


In the summer of 2014, GBC consulted on the Draft Local Plan Strategy and Sites document. This document included a draft site allocation for a new settlement at the Former Wisley Airfield (Policy A35).

The land allocated extended to 69ha in area and was related to the Airfield land only – see map at Appendix 3. The Thames Basin Heaths Special Protection Area (‘SPA’) Exclusion Zone (within 400m of the SPA) was excluded from the allocation
as this land is not considered to be appropriate for new residential development.
The land owned by our Client was also not included within the allocation at this time.

The draft site allocation proposed up to 2,100 homes, which is equivalent to 30 dwellings per hectare (dph) when applied to the proposed site area of 69ha. The application of a 30dph housing density is consistent with the methodology used within GBC’s evidence base.


In the summer of 2016, GBC consulted on the Proposed Submission Local Plan: Strategy and Sites document. This version of the plan also included a draft site allocation for a new settlement at the Former Wisley Airfield (Policy A35).

However, in this revision, the site allocation area included additional land to the south of the airfield as this had been confirmed as available by the relevant landowners, some of whom we represent currently. The total site area, which is illustrated in Appendix 4, is 92.8ha.

The total number of homes proposed remained at 2,100 within Policy A35, despite the additional land included within the allocation boundary. The resulting housing density is equivalent to 23dph, lower than the 30dph proposed in the 2014 version of the allocation and used within GBC’s evidence base methodology.


The latest version of the Local Plan is the subject of this consultation response. Like the versions before it, the 2017 plan includes a strategic allocation for a new settlement at the Former Wisley Airfield (Policy A35).

Since previous versions, the boundaries of site allocation A35 have been extended further to include the Land at Little Upton Cottages which is owned by the Fieldings and forms part of the consortium we now represent. The proposed site allocation now comprises 95.9ha in area and the revised boundaries are shown on the associated map provided at Appendix 5.

Despite the increased size of the site allocation area, the quantum of development proposed remains similar to earlier versions of the plan – i.e. “approximately 2000” conventional homes (Class C3). The resulting housing density provides fewer than 21dph, which is considerably lower than the 30dph proposed in the 2014 version of the allocation and used within GBC’s evidence base methodology.

On behalf of our Client, who as mentioned comprises a consortium of landowners to the south of the Former Wisley Airfield, our response to this revision of the plan is set out below.

**Wisley Airfield Outline Planning Application**

Outline planning permission for development of a new settlement at the site of the former Wisley Airfield (see Appendix 6 for a site plan) was refused by GBC on 8 April 2016 (LPA ref. 15/P/00012). Refusal was predominantly on the grounds of inability to demonstrate very special circumstances to outweigh harm to the Green Belt, a policy test which will not apply should the proposed allocation in the emerging Local Plan be adopted. This planning application sought permission for up to 2,068 residential dwellings, up to 60 sheltered accommodation units, retail, leisure and commercial uses as well as other supporting infrastructure.

The applicant has since lodged an appeal against the decision to refuse the application (PINS ref. APP/Y3615/W/16/3159894) which has been recovered by the Secretary of State. If the Secretary of State determines that the appeal should be allowed, then permission will effectively be obtained for the full extent of residential and other development set out within Policy A35 as currently drafted, but on only part of the land allocated for the development of the new settlement. Under the current bespoke programme the inquiry will take place in September 2017.

**Representations**

**Context**
The National Planning Policy Framework (‘NPPF’) sets out the tests against which Local Plans should be prepared and assessed. Local Plan policies should follow the approach of the presumption in favour of sustainable development.

The principal test guiding policy adoption is that of ‘soundness’, namely that the plan should be (NPPF paragraph 182):

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on crossboundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

It is against these categories that the emerging Local Plan has been reviewed and against which the following representations have been made.

**Principle of Strategic Allocation A35**

As mentioned in previous representations, our Client fully supports the proposed release of the land identified by Policy A35 from the Green Belt, and the associated proposals to promote the creation of a new settlement on this land.

**Extent of Strategic Allocation A35 Boundary**

Our Client supports the extension of the strategic allocation boundary to include the land shown on the map at Appendix 1. The proposed boundary more closely reflects the scale of land identified and assessed within the supporting evidence base for the Local Plan, and (in line with paragraph 85 of the NPPF) also utilises physical and permanent features to create a defensible Green Belt boundary.

**Delivery of the New Settlement Proposed in Strategic Allocation A35**

As currently worded Policy A35 does not seek to impose specific phasing requirements for the delivery of the site, and instead states that GBC will have regard to the “delivery and timing of the key infrastructure requirements on which the delivery of the plan depends”. Our Client supports this approach, as it allows for flexibility in the phasing and delivery of new development where it is appropriately serviced and does not seek to impose delivery and phasing requirements which might otherwise serve to limit or frustrate delivery on the site.

It is worth noting that the land owned by our Client has alternative access, via Hatch Lane, which does not rely on the access routes created by the Wisley Airfield outline planning application. This access arrangement may assist with the early delivery of new development, particularly housing, which is a core objective of the Government’s Housing White Paper (2017). Notwithstanding the fact that the allocated land is served by several access points, we encourage increased connectivity through the new settlement, including links between the Wisley Airfield site and our Client’s land.

**Quantum of Housing Proposed within Strategic Allocation A35**

As detailed out in the ‘Background’ section, through the evolution of the plan the boundaries of strategic allocation A35 have been extended, and as a result the size of the site has increased significantly from 69ha to 95.9ha. This represents a circa 40% increase on the initial site area. As set out above, our Client supports the inclusion of this additional area as it is reflective of the Local Plan evidence base and addresses the Green Belt boundary principles set out in the NPPF.

This 40% increase in area however has not been reflected in the proposed quantum of development to be provided at the site in relation to housing, other uses and infrastructure. The current version of the allocation proposes “approximately 2,000” Class C3 homes, which is fewer than the 2,100 homes proposed when the allocation was initially introduced in 2014. If the quantum of housing was to increase by the same proportion as the site area, then circa 2,940 homes would be proposed (at 30dph). Whilst it may not be necessary to specify this number within the allocation wording, it is clear that the
current reference to “approximately 2,000” homes is not appropriate as it does not respond to the additional capacity which the additional strategic allocation land could provide. Instead we suggest that the allocation wording is revised to reflect the potential to deliver a greater quantum of development to reflect the additional land. It is considered that a range of residential yield should be identified, such as “…in the region of 2,000-2,500 dwellings…”.

The revised wording would then reflect the fact that the land allocated to the south of the airfield site is capable of delivering a high number of new homes, with Wisley Airfield potentially delivering circa 2000 homes as part of the pending planning appeal. Clearly the exact number of homes should be determined through proper masterplanning of the site, and the allocation wording could be further adapted to capture this.

In our Client’s view, the above identified key considerations would suggest that draft Policy A35 as currently worded does not accurately reflect provisions of the NPPF and the opportunity for sustainable development. Our Client suggests that greater flexibility is introduced to draft Policy A35 to allow for a more significant contribution of development, particularly in relation to residential dwellings, with specific reference to a higher number.

For the reasons set out above, our Client considers that Policy A35 of the Proposed Submission Local Plan as currently drafted is unsound with respect to development capacity as it is not:

- ‘Positively prepared’ – Additional development brought through the strategic allocation would further assist in meeting the development needs of GBC and neighbouring authorities. The development potential has not been maximised bearing in mind the significant uplift (40%) in land being promoted, and particularly when there is scope for the Wisley Airfield appeal to meet the current draft allocation for 2,000 units alone;
- ‘Justified’ – As it is not the most appropriate strategy with consideration to the principles of the evidence base and inappropriate reliance on the scope of the outline planning application and planning appeal;
- ‘Effective’ – The allocation currently fails to maximise the opportunities to deliver development provided by the release of Green Belt land, and therefore does not make the most efficient use of land, and so would not positively contribute to addressing cross-boundary strategic housing priorities; and
- ‘Consistent with National Policy’ – As it could do more to “boost significantly the supply of housing” (paragraph 47) and promote sustainable development.

**Conclusion**

The proposed extension of the strategic allocation boundary to include our Client’s land is supported as it reflects GBC’s evidence base and addresses the Green Belt boundary principles set out in the NPPF. Also supported is the exclusion of specific phasing and sequencing requirements, as this could frustrate the delivery of the new settlement.

Our Client does not however support the proposal to provide “approximately 2,000” homes as set out in the Spatial Vision (p22) and in Policy A35 (p225), as we do not believe that GBC has positively addressed the additional land (circa 27ha) which has been included since the allocation was introduced in 2014.

In order to be found sound we request that the Local Authority amend Policy A35 to state that the site can accommodate, “in the region of 2,000-2,500 homes”. Policy A35 (1) should therefore read:

*This is a residential lead mixed use development, allocated for:*
*(1) In the region of 2,000 – 2,500 homes (C3), including some specialist housing and self-build plots, and:*
*The exact number can then be determined through proper masterplanning of the site.*

I trust that the above provides informative comments to the current consultation. I would be grateful if you could please confirm safe receipt of these representation and for above comments to be considered and included in the final version of the emerging Local Plan.

In addition, we request to be kept informed on the Examination proceedings and request to reserve the ability to take part in the Examination Hearings on behalf of our Client.

[Appendices in attachment]
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: CBRE_and_Strutt_and_Parker_Representations_with_Appendix._July_2017.pdf (2.6 MB)

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/4102</th>
<th>Respondent:</th>
<th>17454721 / Andrew Hayley</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
2. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
3. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
4. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
5. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.
6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
7. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification.
8. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
9. Opportunity (3) should be common to all sites and is not unique to this site.
10. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
12. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
13. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).
14. It is further from railway stations than any other identified strategic site.
15. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
16. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
17. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
18. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).
19. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

20. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

21. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”.

22. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.

23. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

24. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

25. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

26. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

27. I object to the Council wasting taxpayers and residents’ time and money not following due process and in particular ignoring previous representations.

28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

29. I object to the Housing number which is unsound and open to legal challenge.

30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
5. It is too far from railway stations.
6. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junctions in the country (J10).
7. Local roads are at capacity particularly when the A3 is not free-flowing (accidents, diversions, roadworks etc).
8. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded A3 and will therefore be unreliable and subject to frequent delays.
9. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
10. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000 per annum.
   - The associated traffic increase from the RHS has not been taken into account, and
   - The regular events at the RHS, which attract 1000’s more visitors several times a year, and the resultant traffic has not been taken into account
11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
12. It remains unclear when/if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
13. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
14. I object to para 22 as this does not reflect the impact of the buildings on the surrounding rural area.
15. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.
16. I object to the Proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
17. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
18. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
19. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
20. I object to the transport evidence base which has been criticised for using out of date modelling software and is therefore unreliable.
21. I object to the housing number which I believe is unsound.

I consider for the reasons listed above and other reasons, that this plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

There are no exceptional circumstances for the removal of this land from the Green Belt. I object to development in the rural Green Belt in preference to the brownfield sites in the urban area.

It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.

It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.

It is further from railway stations than any other identified strategic site. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

It is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (M25/J10)

Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc). The frequent accidents at the Black Swan crossroads demonstrates the danger of relying on local roads. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.

I object to the fact that the increased area, being on the south of the site facing the North Downs AONB will increase the negative impact of the views from the AONB.

I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

I object to the removal of additional 3.1 ha to be removed from the green belt without any justification.

I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.
I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.

I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.

I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.

I object to the Housing number which is unsound and open to legal challenge.

I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.

I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4113  Respondent: 17455073 / Sally Hayley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. I object to the disregard for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
2. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
3. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
4. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.

5. I object to the fact that the council has failed to remove this site from the local plan despite receiving over 50,000 objections from local residents and statutory consultees.

6. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.

7. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification.

8. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.

9. Opportunity (3) should be common to all sites and is not unique to this site.

10. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

12. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

13. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10).

14. It is further from railway stations than any other identified strategic site.

15. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.

16. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.

17. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

18. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc).

19. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

20. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.

21. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”.

22. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.

23. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).

24. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.

25. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

26. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.

28. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

29. I object to the Housing number which is unsound and open to legal challenge.

30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” Yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object strongly to the inclusion of Three Farm Meadows in the Draft Local Plan for a number of reasons.

1. It is very much part of the Green Belt and I object to the change of the Green Belt Boundary to the Eastern End of the site.
2. I object to the fact there has been no clear explanation as to why the council think its appropriate to have a regulation 19 consultation when the changes are major.
3. The location of the build is totally unsuitable and unsafe, the site is extremely close to the most congested road network (A3 and M25) and most congested M25 junction of all (junction 10).
4. It is also adjacent to RHS Wisley where a huge number of visitors which will increase by 500,000 per annum, which will then entail more traffic leading off the A3 or onto the M25 slip road.
5. Any added public transport will have to face the crowded SRN and this would result in serious delays and unreliable services. The station car park already struggles with the amount of cars and the site is furtherest from the station than any other strategic site.
6. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is totally unnecessary.
7. I object to the increased area of the site as this now abuts additional heritage assets, including Upton Farm and Bridge End House negatively impacting the setting of these buildings and the wider Ockham Consecrations Area.

These are just some of the huge number of reasons why this site should not be included in the Local Plan, I have objected so many times and yet the Council are still failing to remove the Three Farm Meadows Site from the Local Plan. I hope you finally take in what all the local residents have been trying to say and realise what a huge effect this will have on the beautiful, historic and peaceful village of Ockham. You are destroying a piece of History.

Please please please remove this site from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp172/4124</th>
<th>Respondent: 17455585 / Victor Truscott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Policy A42 change at Clockbarn Nursery to increase the number of home by 33% on this site from 45 to 60 and after hundreds of previous objections which were ignored is unacceptable. Tannery Lane is a narrow lane with blind bends and cars frequently have trouble passing each other. Turning into Tannery Lane from the A247 only 5 of the 10 dwellings have off street parking and parking by residents on the road causes passing problems and at times moving their vehicles to allow for lorries to get through, this will become worse with increasing numbers of vehicles. Vehicles turning in from or exiting onto the A247 have very poor sight lines at this junction due to parked cars. The pavement in Tannery Lane itself for pedestrians is outside these homes and is in a very bad state of repair therefore it is very dangerous to walk down Tannery Lane with vehicle movements. The recent planning application for the Marina development is already adding to vehicular problems. Surface water flooding in this area is a problem and will be made worse with development and needs to be addressed. Finally the countryside and wildlife of which can be seen regularly will be hugely affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4123</th>
<th>Respondent: 17455585 / Victor Truscott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I object to Policy A43 this land is Green Belt, with ancient woodland. The development would have a huge impact on the Flora, fauna and wildlife in the vicinity and development on this land will join the villages of Ripley and Send together defeating the object of the Green Belt. The local roads, doctors, schools, amenities are already struggling to cope with the existing residents and would be under pressure and would definitely not be fit to serve residents from another 400 homes.

Finally I feel that consideration should be made to firstly the existing infrastructure especially A247 Send Road, Clandon Road and Portsmouth Road at Ripley, the bus service, doctors, schools, shops etc. should any development within Send be approved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID: pslp171/2287</th>
<th>Respondent: 17455585 / Victor Truscott</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 which was deleted from the 2014 draft, Industrial and Warehousing in this area will have a huge impact on all the local roads. Guildford Borough Council are not in need of more Industrial units as Slyfield Industrial Estate is not used at full capacity so there is no need to build this in the middle of the Green Belt when other Brown site are available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4134</th>
<th>Respondent: 17455745 / Christine Kavanagh</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Green Belt Policy 2 paragraph 4.3.15 the proposal to inset Send Business Park from the Green Belt because of the narrow vehicular access at either end of Tannery Lane. Any further additions to the Business Park would ruin the openness of the countryside and detract from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A29: Land to the south and east of Ash and Tongham

- I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

1. **Policy A29: Land to the south and east of Ash and Tongham (Cont.)**

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”.

- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be completed before any development of Policy A29 commences.
- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.

1. The Street in Tongham
2. A331/A323 intersection
3. A31/White Lane junction

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”.

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

**Attached documents:**
1. **Policy P3 - Countryside**

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
- **4.3.29 Amend to:** “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford Borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
- **4.3.30 Amend to:** “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”
- **Policy P3 Amend to:** (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

3.29 Amend to: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford Borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

3.30 Amend to: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend to: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:
1. I object to the housing number of 693/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.

2. I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4140  Respondent: 17456961 / Justine Ayears  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Garlics Arch proposal as it uses valuable green belt land and the green space between the settlements at Burnt Common, Send Marsh and Ripley resulting in unacceptable harm to the openness of the Green Bely and the vistas locally and from the Surrey Hills AONB.

2. I continue to object to the inclusion of the following policies:

3. A36-A41 inclusive in the Horsleys, A43 at Garlick’s Arch, A42 Clockbarn, and A58 There is no evidence that anyone has considered the cumulative impact of these developments together with the development at A35. The infrastructure proposed is totally inadequate and, as these stand at the borough boundary will have a huge impact on residents throughout the borough and further afield, particularly those who use the A3.

4. I object to the fact that the land required at Garlick’s Arch is said to be almost 29ha where only 13ha is required at 30dph.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4139  Respondent: 17456961 / Justine Ayears  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the changes being proposed in and around Burnt Common as this will increase the traffic congestion and increase the strain on the local road network which is already at a severe level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2306  Respondent: 17456961 / Justine Ayears  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2303  Respondent: 17456961 / Justine Ayears  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the need for affordable homes within the borough and the inclusion must be firmed up to ensure all developments include the correct ratio of affordable homes and that loop holes previously used to by-pass this provision are closed.

I support the proposals for the mix of affordable homes however the mix of property size and classification of type must be amended to ensure a significantly higher proportion of family homes are included and the number of single bedroom properties are reduced within allocations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp171/2307  Respondent: 17456961 / Justine Ayears  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

---
<table>
<thead>
<tr>
<th>Comment ID: pslp171/2309</th>
<th>Respondent: 17456961 / Justine Ayears</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy H2 para 4 needs to include that any funds paid in lieu of affordable housing should be ringfenced and the wording further tightened by replacement of “expect” by “will enable”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The tone of many of the policies has been relaxed too much and the words expect, may, should etc must be replaced with words that ensure the policies will be followed rather than the weaker terms that will be exploited are currently used.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4148</th>
<th>Respondent: 17457825 / Wisley Action Group (H M Jefferies)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I write on behalf of the Wisley Action Group. Please find below and attached our comments on the proposed draft submission plan. This is in addition to our previous representations on the Local Plan.

We reserve our right to present this evidence together with all our previous representations to the Inspector at the examination of the Plan.

Generally, it is disappointing to note that the Council has given very little weight to either the refusal of the planning application on site A35 or indeed to any of the thousands of representations made by ourselves and other members of the public and statutory bodies.

WAG is of the opinion that the change in the boundary of Allocation 35 allows us and others to make further comments on this site allocation. We are also of the view that the change in the housing number allows us to comment on all other aspects of the plan which rely on the housing number – i.e. everything. It is also clear that the changes/amendments to the evidence base on highways, ecology, infrastructure invites consultation on all of these issues.

WAG is of the view that the current consultation cannot legally constitute a regulation 19 consultation for the reasons outlined by Richard Harwood QC in Appendix 1.

I. WAG objects to the fact that there has been no clear explanation from the Council as to why they think it is appropriate to have a regulation 19 consultation when the changes made are major, for example the removal of a strategic site and a reduction in the housing number.

II. WAG also objects to the fact that there is no clear explanation why the Plan period has changed particularly as this has not been either justified or clearly identified.

III. WAG objects to the Council wasting tax payers’ and residents’ time and money not following due process and indeed ignoring previous representations.

WAG notes that the quality of evidence remains poor and is in some cases out of date and in most cases inconsistent. For example:

IV. WAG objects to the fact that there is no comprehensive list of the evidence base. See below:

[see attachment for image]

It is incumbent on the Council to ensure that the evidence base is readily accessible and completely transparent. WAG is of the opinion that the evidence is neither easily accessible nor transparent.

V. WAG objects to the use of the West Surrey SHMA and the Guildford addendum 2017 as these documents are based on false premises (inflated student number for example) and notes that the review by the independent expert Neil McDonald on behalf of the Guildford Residents’ Association questions the soundness of the SHMA. (Appendix 2)

V. WAG also objects to the transport evidence bases including the SHAR 2016 Highways assessment report which has been criticised by Mouchel, amongst many others for using out of date software and it is therefore unreliable.

VI. WAG continues to object to the use of the highly inconsistent Green Belt and Countryside Study and its numerous addenda as this document is subjective, misleading and inconsistent and therefore unreliable.

VII. WAG objects to the ELNA and in particular the Carter Jonas study update 2017 which includes “demand” for retails space from companies in administration.

With regard to the policies in the plan WAG makes the following comments:

VIII. WAG objects to the inclusion of a 10% buffer in the housing number over the plan period as we are advised by counsel that this is unnecessary.
IX. WAG objects to the housing number and in particular the fact that the Council have not, as required, used any constraints such as green belt, infrastructure, AONB, air quality, TBHSPA etc. WAG believes that the housing number is open to legal challenge.

X. WAG objects to the quantity of space allocated for retail in the town centre. Retail is changing and the need for “bricks and mortar” reducing. This space could be much better utilised as a sustainable residential space within easy walking distance of employment and establish transport links.

XI. WAG objects to the calculations used for industrial space which appear to use a far lower ratio than the industry standard resulting in unnecessary land take which has an impact on the use of green belt land.

XII. WAG objects generally to the poor drafting and apparent lack of proof-reading. An example of this is policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” when in fact the figures in the table add up to 9,810. It is impossible for members of the public to understand this kind of error/lack of clarity.

XIII. WAG objects to the fact that a number of policies use words such as “seek” and “request” which would render the policies unenforceable. All of these weasel words should be replaced without exception with strong verbs such as “require” and “demand”.

XIV. WAG objects to the apparent disregard for the impact of air pollution on residents of the borough and considers that the evidence submitted on air quality is not only woefully inadequate but also misleading.

XV. WAG objects to the fact that no account appears to have been taken on the impact of pollution on the TBHSPA particularly the damage caused by nitrogen deposition. It is an undeniable fact that the level of growth proposed by this plan will result in increased traffic movements and by extension increased polluting emissions. Any argument that relies on potential changes to the make-up of the vehicle fleet in terms of fuel source is clearly premature.

XVI. WAG objects to the fact that there is no consideration of the impact of in-combination development on the TBHSPA especially the large proposed developments in neighbouring authorities.

XVII. WAG objects to the fact that there is no justification for the removal of the strategic site at Normandy over and above the removal of any other strategic site and in particular site A35 on many grounds but most notably on sustainability grounds.

In relation to the specific allocation of site A35, WAG has a number of objections as outlined below:

a. WAG objects to the inclusion of site A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of infrastructure and in particularly the sewerage constraint due to lack of any spare capacity at Ripley sewage works.

b. WAG objects to the fact that the Council appear to have directed that the transport assessment for site A35 uses prescribed vehicle movements from site with no justification. WAG believes this makes the transport evidence subject to challenge due to bias on behalf of the Council.

c. WAG objects to the inclusion of site A35 as it is the least sustainable site identified in both this version and previous versions of the plan because of the constraints of the site and the physical location which is adjacent to the TBHSPA.

d. WAG objects to this site due to the fact that it is further from the railway stations than any other strategic site and in fact further from the railway than any other site in the borough save for the land between Seale and Shackleford.

e. WAG objects to the inclusion of site A35 in spite of unanimous rejection of planning application 15/P/00012 on 14 grounds.

f. WAG objects to the inclusion of site due to the fact that it is adjacent to the most congested stretch of strategic road network in the county and close to one of the most congested junctions in the country (J10). The SRN in this location is currently operating significantly over-capacity and the proposed improvements both uncertain in design and timescale.
g. WAG objects to the fact that the withdrawal of the objection from Highways England dated 5th October 2016 almost certainly does not take into account the approval granted to the RHS Wisley on 5th October 2016 which has a significant impact on traffic. The assertion that RHS traffic does not impact the peak hour traffic is clearly false as day visitors leave the Gardens during the afternoon peak as any local resident will confirm.

h. WAG objects to the inclusion of site A35 due to the fact that the local road network is also at capacity and is severely adversely affected when the SRN is not free-flowing at times of accidents, diversion, roadworks etc.

i. WAG objects to the allegation that public transport provision will be able to mitigate the impact of this allocation especially as bus routes to/from Guildford will have to utilise the over-crowded SRN in one/both directions and therefore will be unreliable and subject to frequent delays.

j. WAG objects to the inclusion of site A35 due to the fact that any public transport (bus services) provision to Horsley and/or Effingham junction will impact the safety of the local road network as the lanes are not legally wide enough to accommodate PSVs, particularly when sustainable methods of travel such as cycling and walking are being promoted on the same lanes at the same time. This is not only unrealistic but it is also unsafe.

k. WAG objects to the allocation of site A35 due to the fact that the mitigation to address the impact of increased traffic will not address the commuters travelling to Woking station.

l. WAG objects that due to the fact that site A35 is adjacent to the most popular tourist attraction in the south-east, the RHS at Wisley where the visitor numbers are due to increase by 500,000 visitors per annum and that the associated traffic increase has not been properly modelled or taken into account; and

m. WAG objects to the fact that nor has any account been taken of the traffic resulting from the regular events at the RHS which attract 1000’s more visitors several times a year in the consideration of the allocation of site A35.

n. WAG objects to the fact that the inclusion of site A35 has not properly taken into account the impact of the changed boundaries of the allocation on the adjoining heritage assets and in particular the impact on the setting of Bridge End House (Grade II) and Upton Farm (Grade II) in addition to the known impact on Yarne and also impact the setting of the Ockham conservation area.

o. WAG objects to the fact that the increased allocation at site A35, being on the south of the site facing the Surrey Hill AONB will further negatively impact the views to and from the AONB.

p. WAG objects to the removal of an additional 3.1ha of land from the green belt without any justification.

q. Furthermore, WAG objects to change of the site boundaries of allocation A35 as these are not identified clearly or correctly on the plan (Appendix H p16)

r. WAG objects to the unjustified change in the green belt boundary at the eastern end of the site especially as this now encloses an area of high archaeological interest which will prove difficult to develop in the light of the archaeological finds in the surrounding area.

s. WAG objects to the fact that the impact of the OCK/DVOR has not been properly taken into account in the allocation of site A35. It remains unclear when/if this will be decommissioned as the timetable has already slipped. The constraints on the site due to the DVOR are significant and if it is not decommissioned will severely limit the availability of the site to deliver enough land to make the allocation viable.

t. WAG objects to the fact that insufficient weight has been given to the sustainability of allocation A35 due to the lack of employment available onsite meaning that almost all residents will have to travel to work. As already identified above it is unrealistic and unsafe to assume people will walk/cycle to work on narrow unlit local roads on anything more than a very occasional basis.

u. WAG notes that the changes in the opportunities listed in site allocation A35 reinforce why this site is totally inappropriate, talking of “good urban design” – just what is needed in a rural area.
We also include for completeness Appendices damage to the TBHSPA (Appendix 3), relating to Air quality (Appendix 4) and ecology (Appendix 5). Whilst these appendices have been prepared for the forthcoming appeal on a planning application to all intents and purposes the same as site allocation A35 they are all relevant and need to be taken into account.

For all the reasons already identified by the Wisley Action Group together with the reasons listed above it is quite clear that site allocation A35 is unsustainable.

The Wisley Group continues to have very serious concerns on the soundness of the evidence base and objects in the strongest of terms on the proposed submission plan.

A further change which flows from the 2017 changes therefore to delete the former Wisley Airfield allocation. Since it must be accepted by the Council that its 2016 housing requirement is unsound and that too much housing was allocated in that draft, the question is, even on the Council’s figures, what changes should be made to reduce the supply. Given the harm identified by our 2016 representations, the former Wisley Airfield should be deleted to reflect the reduced requirement. Instead the changes propose to remove sites which are more sustainable and more easily developed. All references to development at the former Wisley Airfield, including in the proposed changes, should be deleted. The case for that scheme is further diminished by its failure to contribute to the five year housing land supply. The 2017 Land Availability Assessment Addendum projects the first units coming forward in 2022/23.

The changes fail to take into account developments which have been approved or are proposed since the submission draft, in particular the RHS Wisley consent and Highways England’s plans for the M25 junction 10.

A35 Former Wisley Airfield

This policy should be deleted for the reasons given above.

In respect of the proposed changes:

At paragraph (21), development should be excluded in flood zones 2 and 3, it should not merely be limited.

At paragraph (22), there should be sensitive design at the proposed built up area boundaries, rather than at the site boundaries. The site boundary to the north is quite separate to the edge of the proposed village because of the proposed SANGs. A significant gap between site boundary and built development is also likely to the south. Sensitive design at the site boundaries is not what is needed, the effects of the development on its surroundings will be from the built area.

The changes to the opportunities to refer to ‘good urban design’ and ‘high quality architecture’ which should be sought on any urban site. It does draw attention to the harmful nature of the proposals which are for a high density urban form of development, including buildings of up to five storeys, rather than a village.

The 2017 proposed changes contain an enlargement of the allocation site boundary to include three further fields to the south east of the development. The A35 section of the 2017 document does not however show this as a change: it is only apparent when the 2016 and 2017 plans are compared or when the appendices are examined. It brings further development close to the Ockham conservation area. There is no discernible justification for this further increase in the development area. Additionally a further alteration to the Green Belt boundary is proposed, removing land at the Ockham Lane/Old Lane junction. This is wholly unjustified and there are no exceptional circumstances for making the change.

The proposed reductions in the housing land requirement and supply do not go far enough whilst the extension of the plan period is not justified. The changes do however strengthen the reasons for deleting the former Wisley Airfield site in its entirety.

We agree that the housing requirement in the 2016 plan was too high, however the reduction in the 2017 proposed changes (from 693 to 654 dwellings per annum) is insufficient.

There is no justification for moving the end date of the plan back by a year. The 2016 plan was not unsound because of its duration. The only reasons which there may be for the change are to increase the housing requirement (by adding a year)
and to delay the delivery of new housing (by proposing 850 houses, so above the annual requirement) in that final year (see para 4.1.9). This goes towards a solution for Guildford’s housing needs of strategic sites which may take a long time to come forward (such as Wisley) rather than promoting smaller, sustainable sites within the urban area which are able to provide homes much sooner.

Whilst the buffer over the plan period has been reduced to 10% from 14%, it is still unnecessary. The only requirement for a buffer is for the five year housing land supply and that draws forward housing from within the plan period. There is no justification for any buffer over the plan period.

WAG commented in its 2016 representations that the over-allocation of housing meant that there was no justification for including the former Wisley Airfield (A35) given the harm it would cause. That case is strengthened by the reduction in the housing requirement.

A further change which flows from the 2017 changes therefore to delete the former Wisley Airfield allocation. Since it must be accepted by the Council that its 2016 housing requirement is unsound and that too much housing was allocated in that draft, the question is, even on the Council’s figures, what changes should be made to reduce the supply. Given the harm identified by our 2016 representations, the former Wisley Airfield should be deleted to reflect the reduced requirement. Instead the changes propose to remove sites which are more sustainable and more easily developed. All references to development at the former Wisley Airfield, including in the proposed changes, should be deleted. The case for that scheme is further diminished by its failure to contribute to the five year housing land supply. The 2017 Land Availability Assessment Addendum projects the first units coming forward in 2022/23.

The changes fail to take into account developments which have been approved or are proposed since the submission draft, in particular the RHS Wisley consent and Highways England’s plans for the M25 junction 10.

(Please Refer to Uploaded Rep)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Appendix 2 - Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA Final.pdf (1.2 MB)
- Appendix 1 - Local Plan proposed changes representations.pdf (284 KB)
- Appendix 3 - RSPB SoC.pdf (8.0 MB)
- Appendix 4 - AQ.pdf (124 KB)
- Appendix 5 Appendix 1 - NECR210.pdf (2.8 MB)
- Appendix 5 Appendix 2 .pdf (1.8 MB)
- Appendix 5 Appendix 3 - Relevant Extracts from Habitats Regulations.pdf (2.2 MB)
- Appendix 5 - 807.01 Proof Andrew Baker draft 1.docx (779 KB)
- Wisley_Action_Group_final_response_to_Reg_19_consultation.pdf (166 KB)

Comment ID: pslp17q/438  Respondent: 17457825 / Wisley Action Group (H M Jefferies)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
The present consultation follows the 2016 consultation under regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012. It deals with proposed changes to the 2016 submission local plan. The 2016 submission local plan has not been withdrawn and the current exercise is not a further regulation 19 consultation but an informal exercise into proposed modifications which the Council intend to put before the examining inspector.

The Council decided on 16th May 2017 for ‘such consultation to focus specifically on the proposed changes highlighted in the document’. Accordingly the consultation page on the website https://getinvolved.guildford.gov.uk/consult.ti/pslpss17/consultationHome explains:

“The council is inviting comments about the Proposed Submission Local Plan: strategy and sites 2017 from 12pm (noon) on Friday 9 June to 12pm (noon) Monday 24 July targeted on just the proposed changes to the plan.

After the consultation, the Council will submit the plan for examination by an inspector. Only comments about changes to the plan will be passed on to the inspector from this consultation. The inspector will also receive the comments from the 2016 consultation, so will get the complete picture of comments about the submitted Local Plan.

You can make general comments about the proposed changes to the plan, but the Council is also asking for specific comments relating to legal compliance, soundness and the Duty to cooperate.

Have your say on the Proposed Submission Local Plan: strategy and sites 2017. You can:

- make general comments about proposed changes to the plan as a whole and supporting documents by completing the online questionnaire below and/or
- make comments about proposed changes to specific sections of the plan by reading the online version of the plan below and by using the comments forms embedded throughout the document” (original emphasis)

The Council report for 16th May 2017 says that ‘comments made to parts of the plan that are unchanged should be considered not duly made’ (para 4.6). The local development scheme and the Council report (para 4.4 to 4.6) refers to this as a ‘targeted Regulation 19 consultation’. That is incorrect. A regulation 19 consultation is on ‘the local plan’ (see regulations 17, 19 and 20) not parts of it which have changed from an earlier regulation 19 consultation.

A number of consequences follow:

- The local plan which is intended to be submitted to the Secretary of State is the 2016 submission local plan;
- The changes proposed in the 2017 document can only be made if:
  - The Inspector finds that the 2016 local plan is unsound;
  - The Council asks the Inspector to recommend modifications to cure the unsoundness; and
  - The Inspector exercises his or her discretion to recommend the changes which the Council have proposed rather than any other changes to make the plan sound;
- The 2017 changes proposed by the Council have the same status as any other changes proposed to remedy unsoundness in the 2016 plan;
- Representations can be made seeking changes which are consequences of or alternatives to the 2017 proposed changes.

The proposed changes

We note that there is no explanation in the 2017 local plan document or the Council report as to why the 2016 plan is unsound, the ways in which it is unsound, why the proposed changes would render the plan sound and why they are the best changes to make. WAG of course consider that the plan is unsound.

Wisley Action Group will take up the entitlement to be heard at the examination on the proposed changes: Procedural Practice in the Examination of Local Plans (June 2016, 4th Edition v.1) paragraph 5.22, footnote 10.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I would like to thank you for the opportunity to comment on the ‘Proposed Submission Local Plan’. WYG is appointed by Sladen Estates and Peveril Securities, who have interests in the former Walnut Tree Park and adjacent Nissan car showroom sites in Guildford, to make representations. A location plan showing the extent of the site is enclosed for ease of reference.

The site was not allocated in the ‘Proposed Submission Local Plan: Strategy and Sites’ document published in June 2016, as confirmed in an email discussion with the Planning Policy Team at the time. There is no reference to the site in the 2017 ‘Summary of Key Changes’ document, neither is it highlighted as a change on the revised Guildford Urban Area maps. Despite this, on some (not all) of the Guildford Urban Area and Guildford Town Centre maps, the site now appears to be allocated as a ‘Strategic Employment Site (Light Industry, Industry and Storage and Distribution)’.

The proposed allocation of this site for B2/B8 uses appears to be an error. The site is in an area where several residential developments have taken place in recent years and lies adjacent to sites allocated for further high density residential development (Local Plan site refs. A13 and A14). The appraisal for site ref. A14 in the Council’s Land Availability Assessment 2016 states “With the changing nature of Walnut Tree Close the current B8 use may be unsuitable in a residential area”. Our clients’ site lies immediately adjacent to site ref. A13, therefore we do not consider it to be suitable for new B2/B8 development either. The Nissan site itself was assessed in the 2014 Strategic Housing Land Availability Assessment (SHLAA) where it was earmarked for residential, offices or a mix of both – with no reference to B2 or B8 uses.

The site does have an implemented planning consent for B1 development (permission ref. 12/P/00528). However, the site has been marketed both to let and for sale for more than two years without any serious leads from potential occupiers. This exceeds the required two years of marketing proposed in emerging Local Plan Policy E3 before employment sites can be considered for alternative uses. In addition, our clients also sought to amend the design of the office scheme to improve its appeal to a wider market (permission ref. 15/P/00306) but without success. Whether it is the Council’s intention in the Proposed Submission Local Plan to allocate the site for B2/B8 or B1, the allocation of this site for employment uses would be contrary to NPPF paragraph 22 which seeks to prevent longterm protection of employment sites where there is no reasonable prospect of the site being used for that purpose. The allocation for housing would help the Council meet its Objectively Assessed Need for housing in a way that would minimise the requirement for Green Belt release. The provision of housing on this site should therefore be reasonably welcomed.

Our clients had pre-application discussions with the Council’s Development Control Team in March to bring forward housing on the site. In terms of availability, the majority of the site has already been cleared and there is a realistic prospect that the development will be delivered in the next five years. The site is likely to be attractive to the housing market, given the close access to Guildford railway station and Guildford Town Centre, and the changing nature of the area towards...
residential uses. The scale of development that could be accommodated on this brownfield site, subject to achieving a satisfactory design, would make a significant contribution towards the Council’s housing target and is in a more sustainable location than some of the proposed housing allocations in the new Local Plan.

In summary, it is unclear whether the allocation of this site for B2/B8 uses has been made in error. Notwithstanding, the use of the site for site for B2/B8 development is not considered to be compatible with the increasing number of residential units by being built near to the site. Despite our clients’ concerted efforts to deliver office development on the site, there have been no offers from businesses to occupy the site. Subject to appropriate design, this site is well suited to residential development and the Council has already recognised the suitability of this part of Guildford for residential development by allocating housing sites in the local area.

If the allocation of this site is an error, we respectfully ask that this allocation be deleted as there is no justification for the allocation. We would also would ask officers to carefully consider the allocation of the site for residential, which fully supports with the Council’s desire to make use of previously developed land within urban areas for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4172  Respondent: 17459585 / Elaine Harvey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I particularly object to the inclusion of the large scale development of Three Farms Meadows which has already been unanimously rejected by Guildford Borough Council in recent months. Where we live such a development would create unnecessary damage to the environment and in conjunction with the approved development at RHS Wisley, would put an impossible strain on local infrastructure in particular, the narrow congested and already dangerous country lanes around the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4171  Respondent: 17459617 / Renaissance Classics (Keith Sohl)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, Send will have a significant impact on the already highly congested local rural road network around and within Ripley. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposal to improve the local roads; only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** pslp172/4168  **Respondent:** 17459617 / Renaissance Classics (Keith Sohl)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

...our company which is based on the Portsmouth Road in Ripley and is directly opposite to the proposed development at Garlick’s Arch. As a long time resident within the Woking and Guildford areas I have noted the ongoing deterioration in traffic congestion in this part of Surrey. Expanding residential properties to the extent proposed at Garlick’s arch without planned infrastructure improvements will cause further congestion problems which are very detrimental to the local community in so many respects notably the environment coupled with social and economic factors. Your plan has not shown how infrastructure improvements in all respects (not just road network) would be made. A vague recognition that infrastructure improvements will be required is not specific enough and if such developments are to take place without causing multiple problems then far more consideration has to be given to the strains that such levels of local population explosion will create. I hope that the concerns of local businesses will be listened to as they are the people that need to create employment and economic growth opportunities at a local level. Increasing population and density without the correct infrastructure will be harmful.

As a local business which will be very directly affected by the new proposals in the Guildford Borough Proposed Submission Local Plan (June 2017), we object very strongly to these and in particular to the changes affecting Ripley and Send, which make the Plan even worse than the 2016 proposals. We object on the following grounds:-

- Any development at **Site A43 Garlick’s Arch** would be on Green Belt land, and there is no identified or exceptional need within the Local Plan documentation for this to be the case. The potential of an increase from 400 houses at this site will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

- The inclusion of 6 Travelling Showpeople plots with associated storage facilities at **Site A43 Garlick’s Arch** is entirely inappropriate in a rural environment within the Green Belt and there is no identified need within the Local Plan.

In that respect, the allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. However, the Plan is self-inconsistent and therefore not properly constituted. Section 4.2.22 of the Plan states that “Sufficient sites are identified within the Local Plan [for] 6 plots for Travelling Showpeople” **Why are 75% of them planned for Ripley?** This is unbalanced and unfair and we contend that no Traveller sites should be part of any housing development plan for this area as there is provision at other locations that more than covers the need (e.g. Site A50 Whittles Drive, Normandy).
Also, the Plan states that “if the [Traveller sites] remain unsold, the future use of the land should have regard to an up to date Traveller Accommodation Assessment (TAA) and Strategic Housing Market Assessment (SHMA), with specific consideration of the use of the land for affordable housing”. We re-iterate that we consider that the provision of even more Travellers’ pitches and houses is unjustified in this rural environment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/5221</th>
<th>Respondent: 17459617 / Renaissance Classics (Keith Sohl)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lack of proper infrastructure for planning for Sites A43 and A42: the Foreword to the Plan by Paul Spooner states on page 5: “We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”. The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlick’s Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4169</th>
<th>Respondent: 17459617 / Renaissance Classics (Keith Sohl)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The removal of Site A46 from the Plan (with its proposed 1100 houses) has left the Plan even further unbalanced against the North East of the Borough with over 40% of the development proposed in this small area of Green Belt, all within just 3 miles of Send Marsh.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: pslp172/4170  
Respondent: 17459617 / Renaissance Classics (Keith Sohl)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The potential for a substantial increase in industrial floor-space from 7000 sq. m. to an unspecified amount at the Site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document.

The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely, in policy 4.423a and does not allow for full and proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2416  
Respondent: 17459617 / Renaissance Classics (Keith Sohl)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On Affordable Homes, the previous version of the plan (Policy 4.2.23) stated that Developers will be expected to provide land for affordable homes at nil value. Now the Plan says “Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of this kind of housing. Furthermore, the 2016 Plan used to state (Section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses].” That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason NOT to deliver affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2415  
Respondent: 17459617 / Renaissance Classics (Keith Sohl)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Brownfield Sites A4 and A34 have been removed from the Local Plan – meaning there is more pressure on Green Belt sites to meet the so-called housing “need”. This should be rectified as these sites would be adequate for the developments proposed and indeed are more suitable in terms of convenience and access to town facilities than Green Belt sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: pslp173/620  Respondent: 17459713 / Alan & Cathy Barns  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As residents of Burpham for well in excess of thirty years we have accepted new developments to the surrounding area as they have not largely affected our continued enjoyment as residents of Burpham. This enjoyment has been tested recently as a result of the entirely inappropriately placed Aldi store, with an associated lack of road improvement and too few parking spaces on the Green Man site. This development has, as widely predicted but apparently ignored by designers and planners, had a disproportionate and unacceptable impact on the traffic in the vicinity by creating gridlocks at the Green Man roundabout and exacerbating the already overcrowded Burpham roads at this pinch point in the centre of the village. The surrounding road infrastructure is clearly at breaking point and as a consequence this small suburb of Guildford has its own rush hour traffic jams as well as overcrowding through many other reasons especially when the A3 regularly evacuates through the village from either direction due to the ever-present traffic incidents on the A3 in either direction with resultant noise, inconvenience and pollution.

We live just off the London Road and regularly experience car queues before reaching our road or we have to join a queue when exiting the road. Also, if we are not faced with a queue, at other times of the day the quantity and number of speeding cars prevents us from easily and safely exiting onto the London Road often for five or ten minutes. We have not experienced such a heavy and rapid increase in traffic flow until recently and we believe this is a result of poor planning and anticipation of the impact traffic has in the Burpham area. Consequently, we have little confidence that any proposed road ‘improvements’ for the Gosden Hill housing scheme will improve anything at all and we expect the massive influx of cars this development as currently planned will impose will have an unacceptable affect on the current inadequate road infrastructure. We consider this development has the potential to accelerate Burpham to a vehicular standstill or crawl throughout much of the day.

We therefore object to the Local Plan as currently drafted until:
(i) the problems currently experienced with Burpham traffic flow have been addressed.
(ii) the impact of this proposed development and the associated improvements to infrastructure roadworks have been properly, realistically and sustainably thought through and planned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?